California Public Utilities Commission

LS POWER GRID CALIFORNIA
POWER SANTA CLARA VALLEY PROJECT

Quarterly Monitoring Report Q2/2026

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ESA

LS POWER GRID CALIFORNIA
POWER SANTA CLARA VALLEY PROJECT

Quarterly Monitoring Report Q2/2026

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LS POWER GRID CALIFORNIA
POWER SANTA CLARA VALLEY PROJECT

Quarterly Monitoring Report Q2/ 2026

1. Introduction

The Power Santa Clara Valley Project (Project) is a California Public Utilities Commission (CPUC)-approved transmission project within the city of San José and unincorporated Santa Clara County being developed by LS Power Grid California, LLC (LSPGC or LS Power).[1] The Project consists of the construction, operation, and maintenance of two high-voltage direct current (HVDC) terminals, a transmission line connecting the HVDC terminals, a transmission line connecting one of the HVDC terminals to the existing Pacific Gas and Electric Company (PG&E) Metcalf Substation, and an overhead transmission tie line connecting the other terminal to the existing PG&E San Jose B Substation. Connecting the HVDC terminals to the PG&E Metcalf and San Jose B substations would require PG&E to modify the existing PG&E Metcalf Substation and expand and upgrade PG&E's San Jose B Substation. The CPUC approved the Project on March 19, 2026, and adopted the Final Environmental Impact Report (FEIR) and Mitigation Monitoring, Compliance, and Reporting Program (MMCRP), which includes the Project's mitigation measures, Applicant-proposed Measures (APMs), and PG&E best management practices and field protocols.

This Quarterly Monitoring Report has been prepared to document compliance activities between March 30, 2026 through June 30, 2026 (i.e., Q2; reporting period), in accordance with the Project's MMCRP. This report summarizes construction activities, environmental monitoring, implementation of mitigation measures and APMs, and compliance-related observations associated with Project construction during the monitoring period.

During the reporting period, the CPUC authorized construction activities through four Notices to Proceed (NTP) and four minor project refinements (MPR), as follows:

- **NTP-1/MPR-1**: On March 20, 2026, LSPGC submitted its first notice to proceed request (NTPR-1) and minor project refinement request (MPR-1) seeking authorization to proceed with preparation of Staging Area 6/Fairgrounds Staging Yard to support Project construction activities. The CPUC issued the NTP-1 and MPR-1 approval letters on March 27, 2026.

[1] California Public Utilities Commission (CPUC). 2026. *Decision Granting a Certificate of Public Convenience and Necessity for the Power Santa Clara Valley Project and Certifying the Final Environmental Impact Report*. March 19, 2026.

- **NTP-2**: On March 24, 2026, LSPGC submitted its second notice to proceed request (NTPR-2) seeking authorization to proceed with construction of the Skyline HVDC Terminal. The CPUC issued the NTP-2 approval letter on April 8, 2026.
- **NTP-3**: On March 27, 2026, LSPGC submitted its third notice to proceed request (NTPR-3) seeking authorization to begin construction of the Grove HVDC Terminal and use of the Grove HVDC Terminal Staging Yard. The CPUC issued an approval letter on April 10; a revised NTP-3 approval letter was issued on April 13, 2026.
- **NTP-4**: On April 17, 2026, LSPGC submitted its fourth notice to proceed request (NTPR-4) seeking authorization to begin construction of approximately 9.6 miles of the Grove to Skyline 320 kilovolt (kV) direct current (DC) underground transmission line. CPUC issued the NTP-4 approval letter on May 1, 2026.
- **MPR-2**: On May 8, 2026, LSPGC submitted a request for Minor Project Refinement No. 2 (MPR-2) to the CPUC seeking the approval to use the disturbed lot located immediately east of the Skyline HVDC Terminal temporary staging area described in the FEIR and authorizing the use of the disturbed lot for expansion of the temporary staging and laydown area to facilitate construction activities for the Project. MPR-2 was approved by the CPUC on May 22, 2026.
- **MPR-3**: On May 20, 2026, LSPGC submitted a request for Minor Project Refinement No. 3 (MPR-3) to the CPUC seeking authorization of a minor route adjustment to the Grove to Skyline 320 kV DC Transmission Line. MPR-3 was approved by the CPUC on June 4, 2026.
- **MPR-4**: On June 10, 2026, LSPGC submitted a request for Minor Project Refinement No. 4 (MPR-4) to the CPUC seeking authorization of a minor route adjustment to the Grove to Skyline 320 kV DC Transmission Line. MPR-4 was approved by the CPUC on June 24, 2026.

Construction activities conducted under the approved NTPs and MPRs were required to comply with all applicable conditions contained in the FEIR, MMCRP, permit requirements, Project plans, and CPUC approval letters. Environmental compliance oversight during the reporting period included implementation of environmental training requirements, environmental inspections, and monitoring activities to verify compliance with applicable APMs, mitigation measures, permit conditions, and environmental commitments.

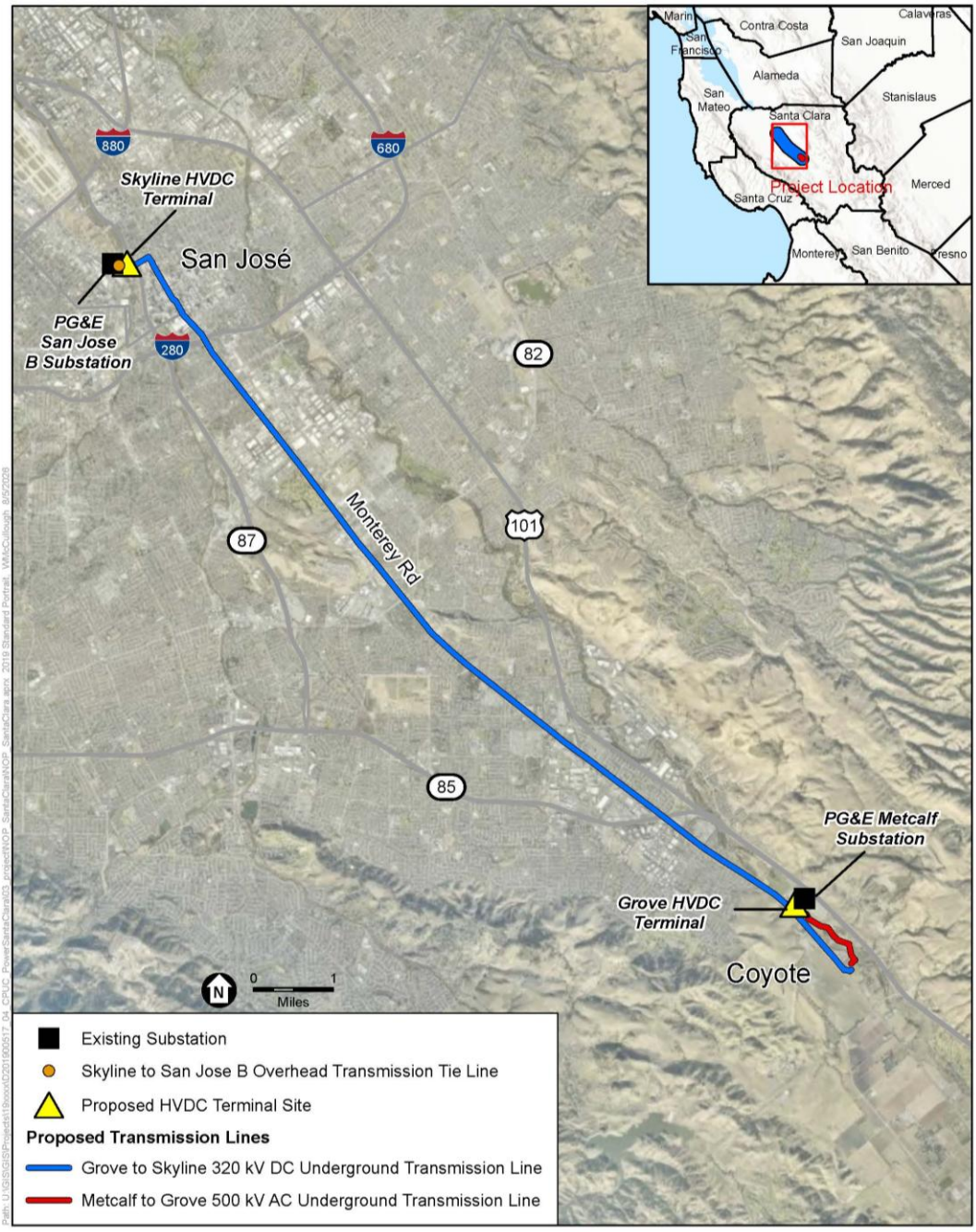

Figure 1-1 Project Location

2. Third Party Monitoring and Level of Effort

As the CPUC's designated consultant, ESA staff performed environmental review, third-party compliance monitoring, and reporting on behalf of the CPUC during the Project's 2026 construction activities. ESA's Compliance Monitors (CM) acted as the primary representatives in the field for the CPUC. The CMs, along with ESA's Project Manager (PM), Deputy Project Manager (DPM), and Monitoring Manager (MM), assisted with review of LS Power's NTP/MPR requests and other pre-construction documentation, performed on site compliance monitoring, and inspected the site in conjunction with LS Power's designated environmental team, KP Environmental and AECOM. The CMs interacted with LSPGC's environmental inspectors in the field to resolve compliance issues. ESA's PM and DPM provided guidance for the compliance monitoring tasks, as performed by ESA's CMs.

During the reporting period, ESA performed 19 site visits. It is anticipated that the regular site visits (once or twice per week) will continue for the remainder of the Project's construction.

3. Construction Activities and Schedule

This section describes the construction activities and schedule.

3.1 Construction Activities

Project construction commenced following the CPUC's NTP-1 approval letter issued on March 27, 2026. NTP-1 authorized preparation and use of Staging Area 6/Fairgrounds Staging Yard, including approval of material deliveries, minor vegetation removal, installation of temporary security fencing and lighting, placement of aggregate base, establishment of temporary construction support facilities, and installation of stormwater pollution prevention best management practices (BMPs) such as placement of straw wattles. Site preparation and construction activities at the site were authorized to begin with implementation of the conditions of approval in the NTP approval letter. Staging Area 6/Fairgrounds Staging Yard was established to support transmission line construction activities, including material storage, equipment staging, worker parking, and construction logistics.

The CPUC issued the NTP-2 approval letter on April 8, 2026, authorizing construction of the Skyline HVDC Terminal. Approved activities included installation of underground telecommunications connections; construction of a new storm drain to convey the water from the stormwater retention system onsite into the City of San José's existing municipal stormwater system; construction of a new electric distribution line to connect the terminal site to an existing electric distribution line; gravel placement to create stable surface conditions and prevent unnecessary sediment transport off-site; installation of temporary perimeter security fencing and lighting, including up to 100-foot-tall lighting shielding masts; storage of hazardous materials such as diesel fuel within the staging area in accordance with the Project's Hazardous Materials Management Plan (HMMP) and Spill Prevention, Control, and Countermeasure Plan (SPCCP); installation of stormwater pollution prevention best management practices (BMPs) such as installation of silt fence and straw wattle in accordance with the Project's Stormwater Pollution Prevention Plan (SWPPP); and construction of the Skyline to San Jose B 230 kilovolt (kV) overhead transmission tie line. The terminal site will be utilized for staging and laydown of terminal components, materials, and equipment as needed during construction.

On April 10, 2026, the CPUC approved the request. On April 13, 2026, the CPUC approved a revised NTP-3, authorizing construction of the Grove HVDC Terminal and use of the Grove HVDC Terminal Staging Yard. Construction activities associated with NTP-3 consist of demolition of existing infrastructure, including removal of existing structures, utilities, and pavement as well as the removal of the existing ornamental trees and landscaped vegetation; grading and importing of fill for raising the base of the terminal enclosures above the base flood elevation; installation of a new construction access with a security gate off Coyote Ranch Road; installation of new stormwater basins with conveyance into the existing stormwater culvert that leaves the Grove Terminal site; installation of aboveground facilities supported by a combination of foundation systems, such as reinforced concrete slab-on-grade elements, spread footings with pedestals, drilled shaft foundations, equipment pads, and below-grade structural vaults; construction of LSPGC's steel H-frame (i.e., dead-end structure) for the PG&E-owned Metcalf to Grove 500 kilovolt (kV) AC transmission line to connect the Grove Terminal to the PG&E Metcalf Substation; installation of temporary security fencing and lighting; installation of stormwater pollution prevention BMPs; and storage of hazardous materials such as diesel fuel within the site during construction in accordance with the Project's Hazardous Materials Management Plan (HMMP) and Spill Prevention, Control, and Countermeasure Plan (SPCCP). The revised NTP approval letter clarified and revised one (1) compliance action for Applicant Proposed Measure (APM) AES-2: Site Design and Landscape Management Plan and required LSPGC to provide the Site Design and Landscape Plan (required per APM AES-2) prior to the start of landscaping onsite.

On May 1, 2026, the CPUC approved NTP-4, authorizing construction of approximately 9.6 miles of the Grove to Skyline 320 kilovolt (kV) direct current (DC) underground transmission line. Work authorized by NTP-4 includes construction of 320 kV DC underground transmission line infrastructure predominately via trenching, involving installation of 19 splice vaults (vaults 4 through 22) within Monterey Road and First Street and duct banks encasing underground transmission line components; installation of XLPE cables within the duct banks; horizontal boring (jack-and-bore or micro-tunneling) at the Union Pacific railroad crossing; installation of two telecommunication fiber optic cables; and tree trimming or removal as needed. Construction activities authorized by NTP-4 will occur mostly within existing public roadways in the City of San José.

Construction activities are anticipated to continue throughout subsequent reporting periods as additional segments of the Grove to Skyline 320 kV Transmission Line and associated Project infrastructure are authorized by the CPUC and other regulatory agencies. Environmental monitoring and compliance inspections will continue throughout construction to confirm compliance with applicable APMs, mitigation measures, permit requirements, and Project plans.

3.2 Construction Schedule

Table 1 provides a summary of approved activities per NTP, approximate start date, and status during the development of this Quarterly Monitoring Report.

TABLE 1
CONSTRUCTION STATUS

Project Component	NTP/MPR (Approval Date)	Anticipated Start Date	Activity Description	Status
Staging Area 6/Fairgrounds Staging Yard	NTP-1 / MPR-1 (March 27, 2026)	March 30, 2026	Preparation and use of the Staging Area 6/Fairgrounds Staging Yard, including gravelling, fencing, environmental controls, material storage, equipment staging, parking, and construction support activities.	Authorized and available for Project construction activities.
Skyline HVDC Terminal	NTP-2 (April 8, 2026)	April 13, 2026	Construction of the Skyline HVDC Terminal, including installation of underground telecommunications connections; construction of a new storm drain; construction of a new electric distribution line; gravel placement; installation of temporary perimeter security fencing and lighting; storage of hazardous materials; installation of stormwater pollution prevention BMPs; and construction of the Skyline to San Jose B 230 kV overhead transmission tie line.	Construction activities authorized and initiated during the reporting period.
Grove HVDC Terminal, Grove HVDC Terminal Staging Yard	NTP-3 (April 13, 2026)	April 18, 2026	Demolition of existing infrastructure; grading and importing of fill; installation of new construction access; installation of new stormwater basins; construction of steel H-frame; installation of stormwater BMPs; and storage of hazardous materials.	Construction activities authorized during the reporting period.
Grove to Skyline 320 kV DC underground transmission line (9.6 miles)	NTP-4 (May 1, 2026)	May 8, 2026	Construction of 320 kV DC underground transmission line infrastructure predominately via trenching; installation of 19 splice vaults; installation of XLPE cables; horizontal boring; installation of telecommunication fiber optic cables; and tree trimming or removal as needed	Authorized during the reporting period.

4. Equipment Reporting

Mitigation Measure 3.3-2a: Construction Fleet Minimum Requirements and Tracking – Tier 4 Final Emissions Controls requires that at least 75 percent of equipment horsepower-hours associated with off-road construction equipment include Tier 4 Final emissions controls. Prior to construction, LSPGC submitted an initial equipment inventory and equipment tracking tool to the CPUC to document compliance with this requirement. The equipment tracking tool is used to document the certified engine

tier and daily operating hours of off-road diesel-powered construction equipment utilized during Project construction activities.

During the reporting period, construction activities utilized equipment typical of underground transmission line construction, including, but not limited to, excavators, backhoes, loaders, cranes, compactors, trucks, generators, and associated support equipment. Equipment utilized for Project construction was operated in accordance with APMs, mitigation measures, permit requirements, and Project plans.

LSPGC continued implementation of Mitigation Measure 3.3-2a throughout the reporting period, including maintenance of equipment inventory records and monthly reporting as required by the CPUC. Updated equipment information was submitted to the CPUC during the reporting period. No air quality compliance issues related to construction equipment were reported during the reporting period.

Per the mitigation measure, LSPGC was required to develop an off-road construction equipment-use hours tracking tool and procedure. However, if all off-road construction equipment is Tier 4 Final certified, the tracking tool is not required. During the Q2 reporting period, LSPGC submitted updated equipment lists to the CPUC confirming that all off-road construction equipment is Tier 4 Final certified, making the tracking tool unnecessary. LSPGC shall confirm with the CPUC each month that all off-road construction equipment remains Tier 4 Final certified.

5. Nesting Birds Compliance

Per APM BIO-9, biological monitors for LSPGC performed nesting bird and roosting bat surveys prior to construction in the area where the work was to occur. Upon discovery of active nests (i.e., containing eggs or young), certain construction activities such as vegetation trimming/removal were avoided during the migratory bird nesting and breeding and roosting bat seasons. The locations of active nests were noted and 50-foot buffers established around the nests, within which work would not occur to ensure that the nesting or breeding activities were not substantially adversely affected. A qualified biologist monitored the nest until the birds fledged or it was determined the nest was no longer active.

Following the LSPGC removal of an inactive nest at the Grove Terminal site without prior notification, the CPUC determined that it was necessary to develop a nesting bird protocol to be followed when no-work buffers or inactive nests were to be removed. The nesting bird protocol specifies that LSPGC must notify the CPUC once a nest is determined to be fledged before the buffer would be released and vegetation removed and that CPUC must give final approvals whether any buffers could be removed once notified.

After issuance of the nesting birds protocol, LSPGC has followed the notification requirements and has sought approval from the CPUC prior the removal of inactive nests or no-work buffers at Project sites.

6. Cultural Resources Compliance

There are five APMs (APM-CUL-1 through APM-CUL-5), five best practices identified by PG&E (BMP CUL-1 through CUL-5), and two mitigation measures (MM 3.5-1 and 3.5-2) related to cultural resources and there are two APMs (TCR-1 and TCR-2) related to tribal cultural resources.

Adherence to APM CUL-1 and TCR-1: WEAP Training is included in the summary below regarding this training. ESA Archaeologists reviewed and approved the WEAP training for cultural resources and tribal cultural resources prior to Q2.

Compliance with APMs CUL-2 and TCR-2 Cultural Resource Monitoring is ongoing by PanGIS and Tamien Nation tribal monitors. Cultural monitoring procedures are defined by the Cultural Resources Management Plan (CRMP) as defined by MM 3.5-2. Cultural material, associated with both historic-era and pre-contact/indigenous context, have been identified at both Grove and Skyline Terminals during Q2. These finds have been in soils previously disturbed or are otherwise out of context, although likely associated with adjacent known cultural resources. APM CUL-3: Unanticipated Discovery has been adhered to during the course of Q2. During this quarter approximately 91 cultural finds have been identified and documented by PanGIS. At this time, ESA has recommended that these finds do not constitute a historical resource, tribal cultural resource, or contributing to the eligibility of a historical resource or tribal cultural resource. Of these finds, 88 have been collected and are currently stored in a lock box at the appropriate Terminal location.

PanGIS has completed additional pedestrian surveys as-needed in compliance with APM CUL-4: Cultural Resources Inventory.

Additionally, no human remains have been identified in Q2, but the Project has adhered with APM CUL-5: Unanticipated Discovery of Human Remains.

One non-compliance incident related to cultural finds occurred during the reporting period. Discussion of this incident is included below in section 9.4, *Non-Compliance Incidents*.

7. Worker Environmental Awareness Program

Prior to construction, LS Power prepared a Worker Environmental Awareness Program (WEAP) to communicate environmental information, mitigation requirements, and appropriate work practices to all construction and supervisory personnel involved with Project construction. The training program focused on site–specific conditions and included a review of the applicable plans and mitigation requirements specific to each portion of the Project. Environmental training materials included a training presentation describing the potential sensitive biological, cultural, and paleontological resources on the Project site and outlined the avoidance and minimization measures and mitigation requirements to be implemented. A Project-specific hard-hat decal was provided to each worker indicating their participation in the WEAP training.

All Project personnel are required to receive environmental training prior to participating in construction work on the Project site. LS Power conducted an initial worker environmental awareness training in a virtual format for the Project on March 23, 2026, prior to beginning work.

8. Minor Project Refinements

During this reporting period, four MPRs were submitted to the CPUC for consideration. MPR-1 was requested on March 20, 2026 and approved by the CPUC on March 27, 2026. MPR-2 was requested on May 8, 2026 and approved by the CPUC on May 22, 2026. MPR-3 was requested on May 20, 2026 and

approved by the CPUC on June 4, 2026. MPR-4 was requested on June 10, 2026 and approved on June 24, 2026. Complete MPR documentation, including approvals, are posted on the CPUC project website: https://ia.cpuc.ca.gov/environment/info/esa/pscv/index.html.

MPR-1: On March 27, 2026, the CPUC approved MPR-1, authorizing a reconfiguration of Staging Area 6/Fairgrounds Staging Yard. Approval of MPR-1 authorized the modification of Staging Area 6/Fairgrounds Staging Yard, which was reconfigured from 12.6 acres to approximately 10 acres pursuant the site's availability. The staging yard would support Project construction activities, including material and equipment storage, construction worker parking, temporary construction offices, refueling activities, equipment washing, and related support functions. The CPUC determined that use of the Staging Area 6/Fairgrounds Staging Yard would not increase the severity of any environmental impact or result in a new significant impact, substantively conflict with any mitigation measure or applicable law or policy, or trigger any new discretionary permit requirement.

MPR-2: On May 22, 2026, the CPUC approved MPR-2 authorizing use of the disturbed lot located immediately east of the Skyline HVDC Terminal temporary staging area and authorizing the use of the disturbed lot for expansion of the temporary staging and laydown area to facilitate construction activities for the Project. The temporary work area expansion comprises approximately 1.1 acres of disturbed land located immediately adjacent to the approved Skyline Terminal temporary staging area at the corner of Santa Teresa and Ryland Streets beneath the overpass of California State Route 87 (Guadalupe Parkway) in the City of San José. Due to the proximity of the Skyline Terminal to known archaeological sites, MPR-2 approval was issued for minimal ground disturbance activities associated with staging area expansion. Minimal ground disturbance that would be associated with fence post installation must be conducted in compliance with LSPGC Mitigation Measure 3.5-1 (Cultural Resources Management Plan [CRMP]) and minimize the possibility of an inadvertent discovery of an intact archaeological deposit. LSPGC was authorized to proceed with the use of the disturbed lot for expansion of the temporary staging and laydown area as described in its May 8, 2026, MPR-2 request to CPUC upon condition that all proposed actions and construction are carried out in accordance with the methods and conditions described in the FEIR, Construction MMCRP, the MPR-2 request, and the approval issued by CPUC.

MPR-3: On June 4, 2026, the CPUC approved MPR-3 authorizing a minor route adjustment to the Grove to Skyline 320 kV DC Transmission Line. Approval of MPR-3 permitted LSPGC to reroute approximately 0.5 mile of the Grove to Skyline 320 kV Transmission Line to avoid conflicts with existing underground utilities along the previously approved route. The adjusted route is similar to that shown in the FEIR for the Downtown Alignment Alternative 2 (FEIR Figure 4-5) with the exception that instead of continuing straight across Bassett Street, the MPR-3 route adjustment turns west and then northwest before Bassett Street and crosses Basset Street just west of the previously approved alignment and parallels to the west of the approved alignment into the Skyline terminal.

MPR-4: On June 24, 2026, the CPUC approved MPR-4 authorizing a minor route adjustment to the Grove to Skyline 320 kV DC Transmission Line. Approval of MPR-4. MPR-4 authorized LSPGC to reroute approximately 0.2 mile of the Grove to Skyline 320 kV Transmission Line in order to avoid conflicts with existing underground utilities along the approved route segment. The approved Grove to Skyline 320 kV Transmission Line route runs along the east side of the Plaza de Cesar Chavez, within the northbound lanes of Market Street, while the proposed MPR-4 route segment runs along the west side of

the Plaza de Cesar Chavez, within the southbound lanes of Market Street. The proposed MPR-4 route segment is located within a paved and developed street in the City of San José, consistent with the approved route segment. Surrounding land uses of the proposed MPR-4 route consist of commercial and public/institutional, similar to the approved segment adopted in the FEIR.

All MPRs were implemented in accordance with the conditions of approval issued by the CPUC and remained subject to all applicable requirements contained in the FEIR, MMCRP, Project permits, and approved Project plans.

9. Compliance Monitoring Summary

9.1 CPUC Third Party Inspections and Mitigation Monitoring

Acting on behalf of the CPUC, the ESA CM conducted environmental site inspections to assess implementation of the Project's environmental requirements by LS Power and their contractors. As set forth in the Final EIR, the MMCRP tracked compliance with the Project permit conditions, environmental commitments, and mitigation measures.

9.2 CPUC Reporting and Compliance Summary

For all site inspections conducted by ESA, a monitoring log was prepared to track the progress of construction and to ensure the Project's environmental mitigation measures were being satisfactorily implemented. These monitoring logs are intended to note site observations, any problems that may occur and recommend actions to rectify the problem. Logs also note deviations from permit conditions, NTPs, MPRs, APMs, or mitigation measures, particularly when the activity puts a sensitive resource at risk. Such activities should be considered a non-compliance incident. A noncompliance incident may include failure to fully comply with all terms and conditions in permits or approvals from other federal, state, and local agencies that are relied upon in the mitigation measures and APMs. ESA's monitoring logs documenting site visits and compliance recommendations are provided in **Appendix C**.

TABLE 2
COMPLIANCE SUMMARY[2]

Measure	Implementation
MM 3.1-2 – Minimize Fugitive Light from Temporary Sources Used for Construction	Temporary lighting was minimized and directed away from sensitive resources and adjacent properties to the extent practicable.
MM 3.3-2a – Construction Fleet Minimum Requirements and Tracking – Tier 4 Final Emissions Controls	Equipment inventories and tracking procedures were implemented, and equipment use was documented in accordance with Project requirements.
MM 3.3-2c – Use Best Management Practices for Construction-Related Fugitive Dust Emissions	Fugitive dust control BMPs were implemented, including watering, track-out controls, speed limits, material covering, and other required dust-control measures.
APM BIO-1 – Restoration of Disturbed Areas	Temporary disturbance areas were maintained for future restoration and restoration requirements were incorporated into construction planning.

[2] Table 2 includes measures that were assessed during construction monitoring compliance visits. The entirety of Applicant Proposed Measures (APMs), Best Management Practices (BMPs) and Mitigation Measures (MMs) is included in the MMCRP in **Appendix D**.

Measure	Implementation
APM BIO-2 – Rare Plant Surveys	Rare plant surveys were completed in applicable areas prior to construction activities.
APM BIO-3 – Preconstruction Sweeps	Preconstruction biological surveys and sweeps were conducted ahead of applicable construction activities.
APM BIO-4 – Sensitive Area Demarcation	Environmentally sensitive areas were identified and protected with appropriate exclusion measures where required.
APM BIO-5 – Vehicle Cleaning Prior to Entering Natural Areas	Construction equipment and vehicles were cleaned as necessary to prevent the spread of invasive plant species.
APM BIO-6 – Vehicle Speed Limits	Construction vehicle speed limits were implemented and communicated to construction personnel.
APM BIO-7 – Outdoor Lighting Measures	Construction lighting was minimized and directed away from sensitive habitat areas where practicable.
APM BIO-8 – Worker Environmental Awareness Program Training	Environmental awareness training was provided to Project personnel prior to performing construction activities.
APM BIO-9 – Nesting Bird Protection Measures	Nesting bird protection measures were implemented for construction activities occurring during the nesting season. A nesting bird protocol was developed requiring that 1) the CPUC be notified once a nest is determined to be fledged or otherwise inactive prior to the buffer being released and vegetation removed and 2) that CPUC must give final approvals whether any buffers could be removed once notified.
APM BIO-10 – San Joaquin Kit Fox Surveys	Protocol surveys and preconstruction survey sweeps were conducted within all proposed impact areas and suitable buffers within suitable habitat areas for San Joaquin kit fox.
APM BIO-11 – Excavation Wildlife Safety Best Management Practices	Open excavations and trenches were protected with covers, escape ramps, or equivalent measures as appropriate.
APM BIO-12 – Special-Status Bird Surveys	Protocol surveys were conducted for Swainson's hawk and bald eagle; focused surveys were conducted for tricolored blackbird and other raptors; and preconstruction survey sweeps conducted within all proposed impact areas and suitable buffers within suitable habitat areas for Swainson's hawk, tricolored blackbird, bald eagle, burrowing owl, and other raptors.
APM BIO-13 – Raptor Surveys	Raptor surveys were completed, as applicable, and avoidance measures were implemented where necessary.
APM BIO-14 – Nesting Bird Surveys	Nesting bird surveys were conducted prior to applicable vegetation-disturbing and ground-disturbing activities.
APM BIO-15 – Special-Status Invertebrate Surveys	Applicable special-status invertebrate survey requirements were implemented prior to construction in suitable habitat.
APM BIO-16 – Special-Status Amphibian Surveys	Applicable amphibian survey and avoidance requirements were implemented prior to construction activities.
MM 3.4-1 – Avoid Impacts to Rare Plants	Rare plant protection requirements were implemented where applicable.
MM 3.4-2 – Protection of Special-Status Wildlife	Biological monitoring, clearance surveys, and wildlife protection measures were implemented as required.
MM 3.4-4 – Habitat Restoration and Monitoring	Restoration planning and habitat protection requirements were incorporated into Project construction activities.
MM 3.4-5 – Compliance with Local Tree Ordinances	Local agency coordination and tree protection requirements were implemented where applicable.
APM CUL-1 – Worker Environmental Awareness Program Training	Cultural resources awareness training was provided to construction personnel.
APM CUL-2 – Cultural Resources Monitoring	Archaeological and Native American monitoring requirements were implemented where required.
APM CUL-3 – Unanticipated Discovery of Potentially Significant Prehistoric and Historic Resources	Discovery procedures were communicated to construction personnel and incorporated into environmental compliance protocols.
APM CUL-4 – Cultural Resources Inventory	Cultural resource inventory requirements were completed for applicable work areas.

Measure	Implementation
APM CUL-5 – Unanticipated Discovery of Human Remains	Human remains discovery protocols were incorporated into construction and environmental compliance procedures.
MM 3.5-1 – Cultural Resources Monitoring Plan (CRMP)	Archaeological monitoring was conducted in accordance with the approved Cultural Resources Monitoring Plan.
APM GEO-1 – Geotechnical Studies and Geologic Hazard Reduction Measures	Construction activities were conducted in accordance with geotechnical recommendations and soil-management requirements.
APM PALEO-1 – Paleontological Resources Mitigation Monitoring Plan	Paleontological monitoring requirements were implemented in accordance with the approved plan.

9.2.1 Plan Review

Prior to the start of construction, CPUC staff and ESA reviewed the pre-construction plans as set forth in the Project's MMCRP.[3] The completed and reviewed plans include the following:

- Paleontological Mitigation Monitoring Plan (PRMMP)
- Site-Specific Spill Prevention, Control, and Countermeasure Plans (SPCCPs)[3]
- Hazardous Materials Management Plans (HMMPs)[3]
- Contaminated Soil and Groundwater Management Plan
- Final Induction Study and Utility Coordination
- Trail Management Plans[3]
- Skyline Terminal Site Management Plan (SMP)
- Cultural Resources Management Plan (CRMP)
- PG&E Cultural Resources Treatment Plan (CRTP)
- Consultation with Valley Water and Santa Clara County for site plan, grading and drainage plan, and oil containment contingency plan
- Nighttime Construction Noise Plans
- Traffic Control Plans
- Off-Road Diesel Equipment List and Tracking Tool
- Workers Environmental Awareness Program (WEAP Training)
- Stormwater Pollution Prevention Plans (SWPPPs)[3]

LS Power environmental inspectors (KP Environmental) were on site daily to implement measures set forth in the Project's MMCRP. ESA's CMs conducted bi-weekly site inspections for the first several weeks of the Project's construction, then moved to weekly site inspections starting in June 2026.

[3] LSPGC provided separate plans for terminals and transmission line alignments.

9.3 Minor Deviations

No minor deviations were observed during this reporting period.

9.4 Non-Compliance Incidents

9.4.1 Incident #1

One LSPGC self-reported non-compliance incident was documented during the reporting period. On May 29, 2026, ground-disturbing activities were conducted by LSPGC's contractor within previously undisturbed soils at the Grove Terminal site within 100 feet of cultural resource P-43-000189. The activity took place without an archeological monitor present, in conflict with requirements set forth in APs) CUL-2 and TCR-2, and Mitigation Measure 3.5-1.

On the morning of the incident, crews discussed the planned work activities for the day during the 7 a.m. tailboard meeting. Based on the information provided at that meeting, no new excavation within previously undisturbed soils was planned which would require Native American or archaeological monitoring. At approximately noon, the contractor began excavating what they believed to be previously disturbed soils within an excavation area along the southwestern boundary of the Grove Terminal Site along Coyote Creek Road; however, the excavation extended beyond the previously disturbed depth into previously undisturbed native soils. Approximately 10 cubic yards of previously undisturbed native soils were excavated and stockpiled at the site without archaeological or Native American monitoring. The 10 cubic yards of undisturbed native soils were mixed with the approximately 50 cubic yards of previously disturbed soil that was already being stockpiled. An archaeological monitor had been present at the site earlier in the day for an unrelated task but departed after being informed that no new excavation activities were planned. A Native American monitor representing Tamien Nation was onsite on May 29, 2026, at their discretion; however, based on information that excavation would be limited to previously disturbed soils, the monitor observed from a distance and did not inspect the resulting spoils. On the morning of May 30, 2026, the archaeological monitor and Native American monitor arrived onsite to monitor planned excavation activities, and determined excavation had occurred within previously undisturbed soils the previous day.

Corrective action: Construction activities in the affected area were immediately suspended and a stand-down meeting was conducted with representatives from LSPGC, the construction contractor, Tamien Nation, the Project's Qualified Archaeologist, and the KP Environmental Lead Environmental Inspector. During the stand-down meeting, the cultural sensitivity of the Grove Terminal site was reiterated and monitoring requirements applicable to all ground-disturbing activities were reviewed. LSPGC reinforced the requirement that no excavation activities occur without the presence of the required cultural resource monitors when monitoring is required pursuant to the MMCRP, Cultural Resources Monitoring Plan (CRMP), and NTP-3. Following discovery of the deviation, the archaeological monitor established a cultural Environmentally Sensitive Area (ESA) around the excavation area and associated spoils with a 100-foot buffer to facilitate inspection of the disturbed area. The archaeological monitor and Native American Monitor began conducting systematic surveys of the excavation area and spoils on May 30, 2026. The ESA remained in place until all spoils from the excavation site were surveyed, and was removed only when the CPUC approved work to proceed.

9.5 Public Complaints

No public complaints were received during this reporting period.

10. Recommendations

Although Project construction activities were conducted generally in compliance with Project requirements, the following recommendations will help resolve incidents regarding removal of previously active nests and issues involving discoveries of potentially significant cultural resources.

10.1.1 Recommendation #1

Following the removal of nests previously identified as active without prior CPUC approval or notification, the CPUC developed a Nesting Birds Protocol to be followed whenever a nest previously identified as active is deemed inactive and requested to be removed, as well as laying out steps for activities allowed (if any) inside a nesting bird buffer.

Adherence to the Nesting Birds Protocol includes observance of the following:

- Upon initial observation of a nest, LSPGC will provide a description of the nest (i.e. species), location of nest, size of proposed buffer, and proposed activities (if any) to be allowed within buffer.
- To support the review of nesting bird buffer reduction or inactive nest removal requests, LSPGC will email CPUC and ESA and provide the following in writing:
  - Specific nest(s) location(s)
  - Updated tracking table and map of nest records
  - Provide adequate documentation of nests to support the decision to remove the buffer (observations over multiple days **or** evidence of the nests being empty)
    - While either of the above forms of documentation are adequate, should LSPGC provide only one form of evidence, we recommend maintaining an up-to-date nesting tracker and providing high-resolution photographs with clear labels for date and time.

10.1.2 Recommendation #2

Following incidents involving the discovery of potentially significant cultural resources, the CPUC developed a Protocol for Inadvertent Discovery Finds. Adherence to the Protocol includes the following:

- Protocol for All Finds:
  - LSPGC, or its cultural resources consultant, will notify the contacts specified in the protocol and provide the following in writing:
    - Date/time of find
    - Find ID
    - Specific find location(s)

    - Description of find
    - Status of find
    - Photos of finds (if appropriate)
    - Include a ruler or other item (pen or coin) to provide scale
    - Updated tracking table
  - If appropriate, findings may be communicated via phone, to be followed up through email documentation.
  - On behalf of CPUC, ESA will review the information provided by LSPGC and provide acknowledgement and recommendations via email.
- Protocol for Prehistoric/Indigenous Finds and/or Human Remains:
  1. Leave the find in place and establish a 100-foot buffer.
  2. Assess whether the find is an intact deposit or disturbed or isolated find.
  3. Immediately follow up to notify the specified contacts via email and provide information as to the disposition of the find and recommended treatment.
  4. The CPUC and/or ESA, as a representative of the CPUC, will review the information and provide guidance on next steps. Do not resume work in the buffer zone of the find without express approval of the CPUC and/or ESA.
- Protocol for Historic Isolated Finds:
  - On a weekly basis, notify the specified contacts by email.
  - If an intact deposit is found, follow the steps above for the prehistoric find procedure.

10.1.3 Recommendation #3

To improve communication and coordination, it is recommended that LSPGC provide the CPUC with regular updates regarding agency communications and coordination efforts, and documentation of permits obtained prior to the commencement of construction activities. These updates can be provided orally during regular biweekly meetings between the CPUC and LSPGC.

Appendix A
Equipment Compliance Reports

Power Santa Clara Valley – Equipment List June 2026

EIN#	Equipment Type	Engine Tier
EM8G35	Excavators	T4F
EG3T64	Excavators	T4F
PU9A33	Rough Terrain Forklift	T4F
LA7D34	Rubber Tired Loaders	T4F
HW7P54	Excavators	T4F
DL7A49	Excavators	T4F
KL4W38	Forklift	T4F
EV5E39	Rubber Tired Loaders	T4F
KU6T63	Excavators	T4F
AA6G34	Crawler Tractors	T4F
CH7K55	Skid Steer Loaders	T4F
DR6G66	Other Construction Equipment	T4F
GJ8M45	Rollers	T4F
GM8E99	Skid Steer Loaders	T4F
HN9R35	Excavators	T4F
ML4D34	Tractors/Loaders/Backhoes	T4F
XM5A77	Telescopic Handler	T4F
YX4B76	Telescopic Handler	T4F
AE4J73	Excavators	T4F
AG8T84	Compactor	T4F
BT6H64	Telescopic Handler	T4F
CT6K94	Rubber Tired Loaders	T4F
CX9G89	Sweepers/Scrubbers	T4F
FF4V58	Excavators	T4F
KH8Y76	Off Highway Trucks	T4F
RG4T78	Crawler Tractors	T4F
YE6P94	Skid Steer Loaders	T4F
YY4F94	Excavators	T4F
AG6L69	Off Highway Trucks	T4F
WC4S36	Excavators	T4F
EU5F34	Excavators	T4F
UH6F85	Off Highway Trucks	T4F
NP6P44	Rollers	T4F
MY7D96	Rollers	T4F
NA4W59	Excavators	T4F
PH5C76	Excavators	T4F
XL6K76	Excavators	T4F
EX6J64	Excavators	T4F
HT5L69	Excavators	T4F
MS8N68	Excavators	T4F
ND7T38	Excavators	T4F

Power Santa Clara Valley – Equipment List June 2026

EIN#	Equipment Type	Engine Tier
AB6C56	Excavators	T4F
YL3A34	Excavators	T4F
FW4V86	Excavators	T4F
MS7A97	Excavators	T4F
WR7B93	Excavators	T4F
FJ5H94	Rubber Tired Loaders	T4F
JG4V84	Skid Steer Loaders	T4F
UJ8V54	Skid Steer Loaders	T4F
FD7A46	Skid Steer Loaders	T4F
LJ4R78	Skid Steer Loaders	T4F

Table 1: Power Santa Clara Valley Off-Road Diesel Equipment List

EIN	Equipment Type	Engine Year	HP Rating	Engine Tier
RC8T84	Cat D6	2022	251	T4F
CA4A36	Cat 315 Excavator	2021	97	T4F
TE6B85	Cat 299 Skidsteer	2024	101	T4F
JS7B94	Cat 336	2024	300	T4F

Appendix B
ESA Monitoring Logs

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Power Santa Clara Valley

Compliance Monitoring Log

Date: 4/14/2026 **Time:** 10:00AM-12:00PM

Report Code: PSCV20260414_KH_SD

Project Site: Grove Terminal, Santa Clara Fairgrounds, and Skyline Terminal

Compliance Level:

Acceptable ☐ Minor Corrective Action ☒ Non-Compliance ☐
Minor Problem ☐ Violation ☐

Compliance Advisory or Non-Compliance form attached Yes ☐ No ☒

Photo Documentation Yes ☒ No ☐

Type of Monitoring:

Mitigation ☒ Spot-check ☐ SWPPP inspection ☐
Biological ☐ Re-inspection ☐

Construction Activity(s) Being Monitored:

- Site preparation and staging activities for Skyline Terminal, Santa Clara Fairgrounds, and Grove Terminal.

General Summary of Mitigation Compliance and Site Conditions:

Describe site conditions

- Partly cloudy, clear, and warm. Light wind at Skyline and Grove terminals. Moderate winds at Santa Clara Fairgrounds.

Biological Resources

• All workers present received WEAP training.
• No sensitive biological resources or seasonal restrictions affected today's work.
• No protected bird species, nests, or buffers were present.
• Vehicles entered the site clean and biological BMPs were implemented.
• No excavations or trenches were present that could pose wildlife hazards.
• Outdoor lighting was not in use.
• No work impacting wetlands or other jurisdictional waters occurred.
• No directional drilling or frac-out activities occurred.
• No tree removal activities occurred.

Cultural and Paleontological Resources

• No cultural resources issues were identified; no monitoring was required.
• No paleontological resources were encountered.
• Work was not within State Lands jurisdiction and no submerged cultural resources were present.

Soil and Groundwater
• Vehicles and equipment remained within approved work limits.
• Construction did not occur in saturated soil conditions (top soil was wet).
• Cleared and grubbed materials were stockpiled within the active work area and covered.
• Removed vegetation remained onsite.
• Excavated materials were handled in accordance with the Soil and Groundwater Management Plan.
• No groundwater was encountered.

Hazardous Materials
• Secondary containment meeting SPCC requirements was present.
• No work occurred within restricted use or Superfund areas.

Air Quality
• All construction equipment onsite met Tier 4 fleet requirements.
• Dust control watering was observed consistent with BMPs.
• No haul trucks transported material offsite.
• No track-out was observed; prior street sweeping was noted.
• Vehicles adhered to approved speed limits.
• Wind speeds remained below the 20-mph threshold.
• Construction equipment idled less than 5 minutes.
• CPUC dust complaint signage was not observed – **requested to be posted.**
• Wind breaks were present along disturbed areas.
• Sandbags were used to protect storm drains and manholes.
• The site was not inactive long enough to require stabilization.
• Post-construction vegetation planting was not applicable.

Traffic and Utilities
• No bus stop closures occurred.
• No traffic control plan was implemented; nearby dealership test driving was noted as a concern.
• No damage to roads, sidewalks, or trails was observed.
• Utilities were marked prior to construction.

Include corrective actions recommended.
N/A

For minor problems or higher include the following:
• Missing CPUC dust complaint signage
• Concern about high speed traffic from nearby dealerships

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Marker under nest on overpass at Skyline Terminal site.



Containment for future placement of fuel cell. Fairgrounds.

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50-ft buffer set for American robin's nest at Grove Terminal site.

Kendra Hartmann and Stephen Doyle, 4/14/2026

ESA Monitors

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Power Santa Clara Valley

Compliance Monitoring Log

Date: 4/16/2026 **Time:** 8:30AM-11:30AM

Report Code: PSB20260416_VM_RS

Project Site: Skyline Terminal, Santa Clara Fairgrounds, and Grove Terminal

Compliance Level:

Acceptable ☐ Minor Corrective Action ☒ Non-Compliance ☐
Minor Problem ☐ Violation ☐

Compliance Advisory or Non-Compliance form attached Yes ☐ No ☒

Photo Documentation Yes ☒ No ☐

Type of Monitoring:

Mitigation ☒ Spot-check ☐ SWPPP inspection ☐
Biological ☐ Re-inspection ☐

Construction Activity(s) Being Monitored:

- Site preparation and staging activities for Skyline Terminal, Santa Clara Fairgrounds, and Grove Terminal.

General Summary of Mitigation Compliance and Site Conditions:

Describe site conditions

- Sunny, clear, and warm. Light wind at Skyline and Grove terminals. Moderate winds at Santa Clara Fairgrounds.

Biological Resources

• All workers present received WEAP training.
• No sensitive biological resources or seasonal restrictions affected today's work.
• No protected bird species, nests, or buffers were present.
• Vehicles entered the site clean and biological BMPs were implemented.
• No excavations or trenches were present that could pose wildlife hazards.
• Outdoor lighting was not in use.
• No work impacting wetlands or other jurisdictional waters occurred.
• No directional drilling or frac-out activities occurred.
• No tree removal activities occurred.

Cultural and Paleontological Resources

• No cultural resources issues were identified; no monitoring was required.
• No paleontological resources were encountered.
• Work was not within State Lands jurisdiction and no submerged cultural resources were present.

Soil and Groundwater
• Vehicles and equipment remained within approved work limits.
• Construction did not occur in saturated soil conditions (top soil was wet).
• Cleared and grubbed materials were stockpiled within the active work area and covered.
• Removed vegetation remained onsite.
• Excavated materials were handled in accordance with the Soil and Groundwater Management Plan.
• No groundwater was encountered.

Hazardous Materials
• Secondary containment meeting SPCC requirements was present.
• No work occurred within restricted use or Superfund areas.

Air Quality
• All construction equipment onsite met Tier 4 fleet requirements.
• Dust control watering was observed consistent with BMPs.
• No haul trucks transported material offsite.
• No track-out was observed; prior street sweeping was noted.
• Vehicles adhered to approved speed limits.
• Wind speeds remained below the 20-mph threshold.
• Construction equipment idled less than 5 minutes.
• CPUC dust complaint signage was not observed – **requested to be posted.**
• Wind breaks were present along disturbed areas.
• Sandbags were used to protect storm drains and manholes.
• The site was not inactive long enough to require stabilization.
• Post-construction vegetation planting was not applicable.

Traffic and Utilities
• No bus stop closures occurred.
• No traffic control plan was implemented; nearby dealership test driving was noted as a concern.
• No damage to roads, sidewalks, or trails was observed.
• Utilities were marked prior to construction.

Include corrective actions recommended.
N/A

For minor problems or higher include the following:
• Missing CPUC dust complaint signage
• Concern about high speed traffic from nearby dealerships

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Signage on site (1/3) Missing CPUC dust complaint signage. Access gate right



Signage on site (2/3) Missing CPUC dust complaint signage. Access gate left

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Signage on site (3/3) Missing CPUC dust complaint signage

Vince Molina and Rosalind Searle

ESA Monitors

4/16/2026
Date

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Power Santa Clara Valley

Compliance Monitoring Log

Date: 4/21/2026 **Time:** 11:20AM-1:20PM

Report Code: PSCV20260421_AJH

Project Site: Grove Terminal, Santa Clara Fairgrounds, and Skyline Terminal

Compliance Level:

Acceptable ☒ Minor Corrective Action ☐ Non-Compliance ☐
Minor Problem ☐ Violation ☐

Compliance Advisory or Non-Compliance form attached Yes ☐ No ☒

Photo Documentation Yes ☒ No ☐

Type of Monitoring:

Mitigation ☒ Spot-check ☐ SWPPP inspection ☐
Biological ☐ Re-inspection ☐

Construction Activity(s) Being Monitored:

- Site preparation and staging activities for Skyline Terminal, Santa Clara Fairgrounds, and Grove Terminal.

General Summary of Mitigation Compliance and Site Conditions:

Describe site conditions

- Cloudy skies and moderate rain. Light wind at Skyline, Grove terminals, and Santa Clara Fairgrounds.

Biological Resources

• All workers present received WEAP training.
• No sensitive biological resources or seasonal restrictions affected today's work.
• No protected bird species, nests, or buffers were present.
• Vehicles entered the site clean and biological BMPs were implemented.
• No excavations or trenches were present that could pose wildlife hazards.
• Outdoor lighting was not in use.
• No work impacting wetlands or other jurisdictional waters occurred.
• No directional drilling or frac-out activities occurred.
• Tree removal occurred at Grove terminals with AECOM biologist present.

Cultural and Paleontological Resources

• No cultural resources issues were identified; no monitoring was required.
• No paleontological resources were encountered.
• Work was not within State Lands jurisdiction, and no submerged cultural resources were present.

Soil and Groundwater
• Vehicles and equipment remained within approved work limits.
• Construction did not occur in saturated soil conditions (topsoil was wet).
• Cleared and grubbed materials were stockpiled within the active work area and covered.
• Removed vegetation remained onsite.
• Excavated materials were handled in accordance with the Soil and Groundwater Management Plan.
• No groundwater was encountered.

Hazardous Materials
• Secondary containment meeting SPCC requirements was present.
• No work occurred within restricted use or Superfund areas.

Air Quality
• All construction equipment onsite met Tier 4 fleet requirements.
• Dust control watering was observed consistent with BMPs.
• No haul trucks transported material offsite.
• No track-out was observed; prior street sweeping was noted.
• Vehicles adhered to approved speed limits.
• Wind speeds remained below the 20-mph threshold.
• Construction equipment idled less than 5 minutes.
• CPUC dust complaint signage was observed – **Temporary dust complaint signage was observed at Skyline Terminal and waiting delivery of signs for Grove and Santa Clara Fairgrounds Terminal.**
• Wind breaks were present along disturbed areas.
• Sandbags were used to protect storm drains and manholes.
• The site was not inactive long enough to require stabilization.
• Post-construction vegetation planting was not applicable.

Traffic and Utilities
• No bus stop closures occurred.
• No traffic control plan was implemented; nearby dealership test driving was noted as a concern.
• No damage to roads, sidewalks, or trails was observed.
• Utilities were marked prior to construction.

Include corrective actions recommended.
N/A

For minor problems or higher include the following:
• Concern about high-speed traffic from nearby dealerships

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Grading and compacting gravel under overpass at Skyline Terminal site.

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Dust complaint signage at Skyline Terminal site.

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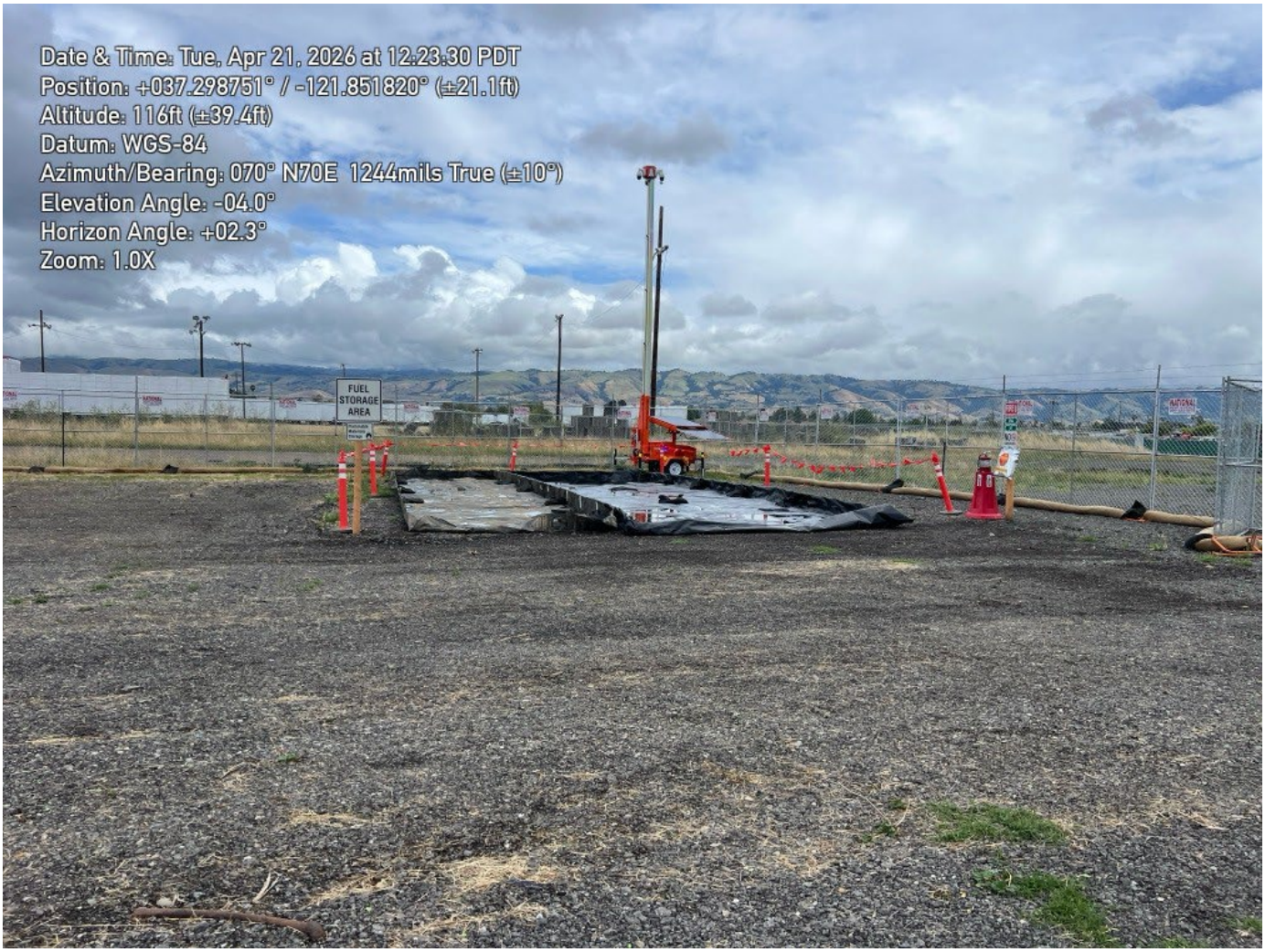

Containment for future placement of fuel cell. Fairgrounds.

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Tree removal at Grove Terminal site.

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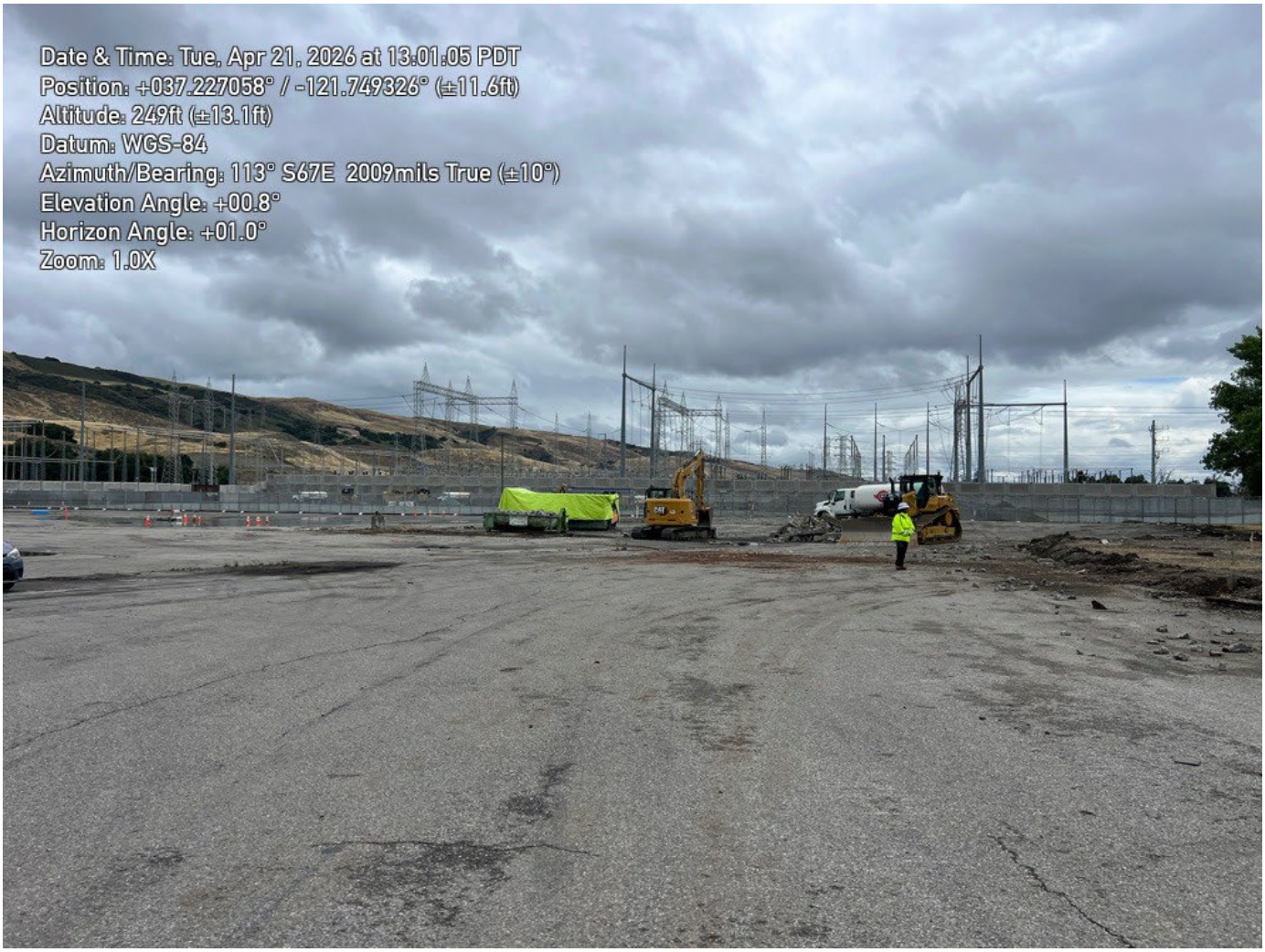

Removal of concrete curb and street light posts at Grove Terminal Site.

Alicia J Herbert, 4/21/2026

ESA Monitors

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Power Santa Clara Valley

Compliance Monitoring Log

Date: 4/23/2026 **Time:** 9:30AM-12:00PM

Report Code: PSCV20260423_SD

Project Site: Grove Terminal, Santa Clara Fairgrounds, and Skyline Terminal

Compliance Level:

Acceptable ☐ Minor Corrective Action ☒ Non-Compliance ☐
Minor Problem ☐ Violation ☐

Compliance Advisory or Non-Compliance form attached Yes ☐ No ☒

Photo Documentation Yes ☒ No ☐

Type of Monitoring:

Mitigation ☒ Spot-check ☐ SWPPP inspection ☐
Biological ☐ Re-inspection ☐

Construction Activity(s) Being Monitored:

- Site preparation and staging activities for Skyline Terminal, Santa Clara Fairgrounds, and Grove Terminal. Tree removal at Grove Terminal.

General Summary of Mitigation Compliance and Site Conditions:

Describe site conditions

- Clear skies. Light wind at Skyline, Grove terminals, and Santa Clara Fairgrounds.

Biological Resources

• All workers present received WEAP training.
• No sensitive biological resources or seasonal restrictions affected today's work.
• No protected bird species, nests, or buffers were present.
• Vehicles entered the site clean and biological BMPs were implemented.
• No excavations or trenches were present that could pose wildlife hazards.
• Outdoor lighting was not in use.
• No work impacting wetlands or other jurisdictional waters occurred.
• No directional drilling or frac-out activities occurred.
• Tree removal occurred at Grove terminals with AECOM biologist present.

NOTES FROM ESA BIO MONITOR:

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Grove
Nesting bird protection: Active bird nests near the project site entrance were reportedly protected by a 50-foot buffer, but buffer was ill-defined and its size was unsubstantiated. At one point during the compliance monitoring visit, the biological monitor responsible for monitoring the nests during nearby tree removal activities was observed standing directly under the active bushtit nest while pointing to it and talking to the tree contractor. It was unclear what activities were allowed inside the 50-foot bushtit nest buffer and 50-foot house finch nest buffer. While tree removal was not allowed within buffer, project-related vehicles and foot traffic frequently passed within the buffer and just feet from the active nests. Further, a 50-foot buffer is not often considered "normal" as suggested by onsite personnel, and a buffer of this small size should be adequately justified by a biologist in writing. ESA biologist Jenna Tuttle recommended to onsite personnel that the active nest buffers be properly defined (i.e., what is not allowed within buffer); the buffer size be thoroughly justified; the buffer be properly enforced; and the active nests be monitored for potential signs of disturbance. APM BIO 14 does require that if a nest buffer cannot be avoided, then consultation should be made with USFWS and/or CDFW.

Skyline
Nesting bird protection: Several active nests are located on the underside of the highway overpass at the east end of the project site, approximately 50 feet overhead. The area underneath was being used for vehicle parking. The nesting birds did not appear disturbed by project activity during the site visit and were actively building additional nests. However, APM BIO-9 requires an onsite biological monitor while active nests are present in the project area. It is unclear how often a biological monitor is currently onsite, but there was not one present during the visit.
Excavations: Per APM BIO-11, areas with potential for wildlife entrapment should be covered or ramped. ESA recommended to onsite personnel that a small open hole be covered.

Fairgrounds
Excavations: Per APM BIO-11, areas with potential for wildlife entrapment should be covered or ramped. ESA recommended to onsite personnel that an open hole near the spigot be covered.

Cultural and Paleontological Resources
• Possible cultural resources identified, cultural monitor / lead on site and area barricaded off.
• No paleontological resources were encountered.
• Work was not within State Lands jurisdiction, and no submerged cultural resources were present.

Soil and Groundwater
• Vehicles and equipment remained within approved work limits.
• Construction did not occur in saturated soil conditions (topsoil was wet).
• Cleared and grubbed materials were stockpiled within the active work area and covered.
• Removed vegetation remained onsite.
• Excavated materials were handled in accordance with the Soil and Groundwater Management Plan.
• No groundwater was encountered.

Hazardous Materials
• Secondary containment meeting SPCC requirements was present.
• No work occurred within restricted use or Superfund areas.

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Air Quality
• All construction equipment onsite met Tier 4 fleet requirements.
• Dust control watering was observed consistent with BMPs.
• No haul trucks transported material offsite.
• No track-out was observed; prior street sweeping was noted.
• Vehicles adhered to approved speed limits.
• Wind speeds remained below the 20-mph threshold.
• Construction equipment idled less than 5 minutes.
• CPUC dust complaint signage was observed – **Temporary dust complaint signage was observed at Skyline Terminal and still waiting delivery of signs for Grove and Santa Clara Fairgrounds Terminal.**
• Wind breaks were present along disturbed areas.
• Sandbags were used to protect storm drains and manholes.
• The site was not inactive long enough to require stabilization.
• Post-construction vegetation planting was not applicable.

Traffic and Utilities
• No bus stop closures occurred.
• No traffic control plan was implemented; nearby dealership test driving was noted as a concern.
• No damage to roads, sidewalks, or trails was observed.
• Utilities were marked prior to construction.

Include corrective actions recommended.
Cover bore hole at Grove terminal. Cover recessed spigot box at Fairgrounds.

For minor problems or higher include the following:

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Uncovered bore hole at Grove terminal.



Culturally sensitive area with barricades and waddling.

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Uncovered water box at Fairgrounds.



Covered dumpsters at Skyline Terminal.

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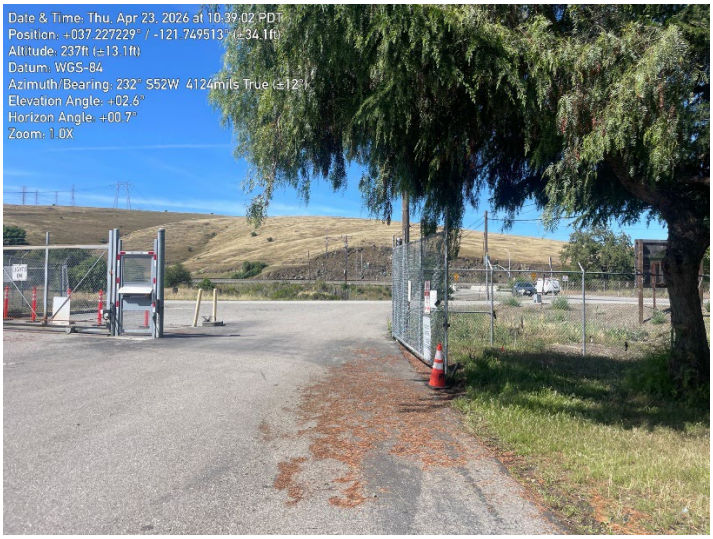
Covered stockpiles at Skyline Terminal.



Buffer around active nests, Grove Terminal

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Buffer around active nests, Grove Terminal

Stephen Doyle, Jenna Tuttle 4/23/2026

ESA Monitors **Date**

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San Francisco, CA 94105
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Power Santa Clara Valley

Compliance Monitoring Log

Date: 4/28/2026 **Time:** 9:30AM-12:00PM

Report Code: PSCV20260430_KH

Project Site: Grove Terminal, Santa Clara Fairgrounds, and Skyline Terminal

Compliance Level:

Acceptable ☒ Minor Corrective Action ☒ Non-Compliance ☐
Minor Problem ☐ Violation ☐

Compliance Advisory or Non-Compliance form attached Yes ☐ No ☒

Photo Documentation Yes ☒ No ☐

Type of Monitoring:

Mitigation ☒ Spot-check ☐ SWPPP inspection ☐
Biological ☐ Re-inspection ☐

Construction Activity(s) Being Monitored:

- Filling, cutting, watering, grading at Skyline; waiting on soil contamination testing results; vacuum street sweeper on site for track out. Gravel laid, graded under overpass; temporary dust signage up at Skyline; permanent signage up at Fairgrounds.

General Summary of Mitigation Compliance and Site Conditions:

Describe site conditions

- Clear skies. No wind at Skyline, Grove terminals, and Santa Clara Fairgrounds.

Biological Resources

• All workers present received WEAP training.
• No sensitive biological resources or seasonal restrictions affected today's work.
• No protected bird species, nests, or buffers were present. AECOM monitor on site for active bird nests near access gate.
• Vehicles entered the site clean and biological BMPs were implemented.
• No excavations or trenches were present that could pose wildlife hazards.
• Outdoor lighting was not in use.
• No work impacting wetlands or other jurisdictional waters occurred.
• No directional drilling or frac-out activities occurred.
• Tree removal occurred at Grove terminals with AECOM biologist present.

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Tree where active nest had been located was removed during tree removal efforts at Grove; recommend establishing procedure for communication re: determination that formerly active nests have become inactive prior to taking action disturbing site of former nest.

Cultural and Paleontological Resources
• Possible cultural resources identified, cultural monitor / lead on site and area barricaded off.
• No paleontological resources were encountered.
• Work was not within State Lands jurisdiction, and no submerged cultural resources were present.

Soil and Groundwater
• Vehicles and equipment remained within approved work limits.
• Construction did not occur in saturated soil conditions (topsoil was wet).
• Cleared and grubbed materials were stockpiled within the active work area and covered.
• Removed vegetation remained onsite.
• Excavated materials were handled in accordance with the Soil and Groundwater Management Plan.
• No groundwater was encountered.

Hazardous Materials
• Secondary containment meeting SPCC requirements was present.
• No work occurred within restricted use or Superfund areas.

Air Quality
• All construction equipment onsite met Tier 4 fleet requirements.
• Dust control watering was observed consistent with BMPs.
• No haul trucks transported material offsite.
• No track-out was observed; prior street sweeping was noted.
• Vehicles adhered to approved speed limits.
• Wind speeds remained below the 20-mph threshold.
• Construction equipment idled less than 5 minutes.
• CPUC dust complaint signage was observed – **Temporary dust complaint signage was observed at Skyline Terminal; permanent signage observed at Santa Clara Fairgrounds Terminal.**
• Wind breaks were present along disturbed areas.
• Sandbags were used to protect storm drains and manholes.
• The site was not inactive long enough to require stabilization.
• Post-construction vegetation planting was not applicable.

Traffic and Utilities
• No bus stop closures occurred.
• No traffic control plan was implemented
• No damage to roads, sidewalks, or trails was observed.
• Utilities were marked prior to construction.

Include corrective actions recommended.
Install CPUC dust complaint signage at Grove.

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For minor problems or higher include the following:



Dust signage at Fairgrounds


Buffer around new active nest at Grove.

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Grading activities at Grove.

Kendra Hartmann 4/28/2026

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ESA Monitors **Date**

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Power Santa Clara Valley

Compliance Monitoring Log

Date: 4/30/2026 **Time:** 9:30AM-12:00PM

Report Code: PSCV20260430_SD

Project Site: Grove Terminal, Santa Clara Fairgrounds, and Skyline Terminal

Compliance Level:

Acceptable ☒ Minor Corrective Action ☒ Non-Compliance ☐
Minor Problem ☐ Violation ☐

Compliance Advisory or Non-Compliance form attached Yes ☐ No ☒

Photo Documentation Yes ☒ No ☐

Type of Monitoring:

Mitigation ☒ Spot-check ☐ SWPPP inspection ☐
Biological ☐ Re-inspection ☐

Construction Activity(s) Being Monitored:

- Site preparation (grinding / asphalt removal) for Skyline Terminal. Deliveries of project supplies at Santa Clara Fairgrounds. Site preparation (grinding / asphalt removal) at Grove Terminal.

General Summary of Mitigation Compliance and Site Conditions:

Describe site conditions

- Clear skies. No wind at Skyline, Grove terminals, and Santa Clara Fairgrounds.

Biological Resources
• All workers present received WEAP training.
• No sensitive biological resources or seasonal restrictions affected today's work.
• No protected bird species, nests, or buffers were present. AECOM monitor on site for active bird nests near access gate.
• Vehicles entered the site clean and biological BMPs were implemented.
• No excavations or trenches were present that could pose wildlife hazards.
• Outdoor lighting was not in use.
• No work impacting wetlands or other jurisdictional waters occurred.
• No directional drilling or frac-out activities occurred.
• Tree removal occurred at Grove terminals with AECOM biologist present.

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Cultural and Paleontological Resources
• Possible cultural resources identified, cultural monitor / lead on site and area barricaded off.
• No paleontological resources were encountered.
• Work was not within State Lands jurisdiction, and no submerged cultural resources were present.

Soil and Groundwater
• Vehicles and equipment remained within approved work limits.
• Construction did not occur in saturated soil conditions (topsoil was wet).
• Cleared and grubbed materials were stockpiled within the active work area and covered.
• Removed vegetation remained onsite.
• Excavated materials were handled in accordance with the Soil and Groundwater Management Plan.
• No groundwater was encountered.

Hazardous Materials
• Secondary containment meeting SPCC requirements was present.
• No work occurred within restricted use or Superfund areas.

Air Quality
• All construction equipment onsite met Tier 4 fleet requirements.
• Dust control watering was observed consistent with BMPs.
• No haul trucks transported material offsite.
• No track-out was observed; prior street sweeping was noted.
• Vehicles adhered to approved speed limits.
• Wind speeds remained below the 20-mph threshold.
• Construction equipment idled less than 5 minutes.
• CPUC dust complaint signage was observed – **Temporary dust complaint signage was observed at Skyline Terminal and still waiting delivery of signs for Grove and Santa Clara Fairgrounds Terminal.**
• Wind breaks were present along disturbed areas.
• Sandbags were used to protect storm drains and manholes.
• The site was not inactive long enough to require stabilization.
• Post-construction vegetation planting was not applicable.

Traffic and Utilities
• No bus stop closures occurred.
• No traffic control plan was implemented
• No damage to roads, sidewalks, or trails was observed.
• Utilities were marked prior to construction.

Include corrective actions recommended.
Install CPUC dust complaint signage at Grove / Fairgrounds.
For minor problems or higher include the following:

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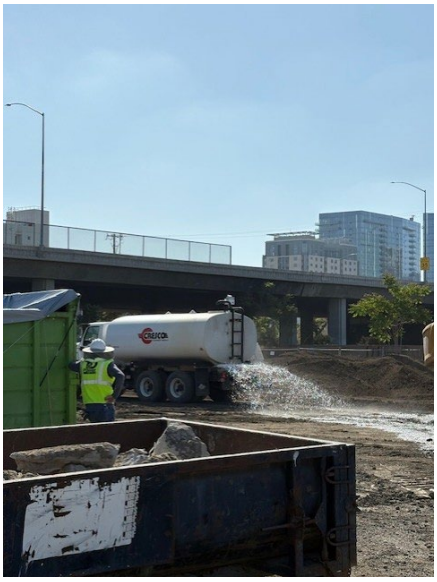

Watering / dust abatement at Skyline terminal.



All dumpsters covered at Skyline terminal.

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Dust control at Grove / covered trenching.



50’ Nest buffer in place for Grove site (AECOM monitor on site).

Stephen Doyle 4/30/2026

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ESA Monitors **Date**

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Power Santa Clara Valley

Compliance Monitoring Log

Date: 5/05/2026 **Time:** 9:30AM-12:00PM

Report Code: PSCV20260430_KH

Project Site: Grove Terminal, Santa Clara Fairgrounds, and Skyline Terminal

Compliance Level:

Acceptable ☒ Minor Corrective Action ☐ Non-Compliance ☐
Minor Problem ☐ Violation ☐

Compliance Advisory or Non-Compliance form attached Yes ☐ No ☒

Photo Documentation Yes ☒ No ☐

Type of Monitoring:

Mitigation ☒ Spot-check ☐ SWPPP inspection ☐
Biological ☐ Re-inspection ☐

Construction Activity(s) Being Monitored:

- Site preparation (gravel base laying, asphalt removal) for Skyline Terminal. Deliveries of project supplies at Santa Clara Fairgrounds. Site preparation (grinding, asphalt removal, concrete foundation laying, removal of storm systems) at Grove Terminal.

General Summary of Mitigation Compliance and Site Conditions:

Describe site conditions

- Clear skies. No wind at Skyline, Grove terminals, and Santa Clara Fairgrounds.

Biological Resources
• All workers present received WEAP training.
• No sensitive biological resources or seasonal restrictions affected today's work.
• New nest found in trees near entrance to Grove (biologist to come soon the scope); nest in door of shed seems to be empty, monitor would like permission to pull out so another finch does not use nest for new nest start.
• Vehicles entered the site clean and biological BMPs were implemented.
• No excavations or trenches were present that could pose wildlife hazards.
• Outdoor lighting was not in use.
• No work impacting wetlands or other jurisdictional waters occurred.
• No directional drilling or frac-out activities occurred.
• Tree removal occurred at Grove terminals with AECOM biologist present.

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Cultural and Paleontological Resources
• Possible cultural resources identified, cultural monitor / lead on site and area barricaded off.
• No paleontological resources were encountered.
• Work was not within State Lands jurisdiction, and no submerged cultural resources were present.

Soil and Groundwater
• Vehicles and equipment remained within approved work limits.
• Construction did not occur in saturated soil conditions (topsoil was wet).
• Cleared and grubbed materials were stockpiled within the active work area and covered.
• Removed vegetation remained onsite.
• Excavated materials were handled in accordance with the Soil and Groundwater Management Plan.
• No groundwater was encountered.

Hazardous Materials
• Secondary containment meeting SPCC requirements was present.
• No work occurred within restricted use or Superfund areas.

Air Quality
• All construction equipment onsite met Tier 4 fleet requirements.
• Dust control watering was observed consistent with BMPs.
• No haul trucks transported material offsite.
• No track-out was observed; prior street sweeping was noted.
• Vehicles adhered to approved speed limits.
• Wind speeds remained below the 20-mph threshold.
• Construction equipment idled less than 5 minutes.
• CPUC dust complaint signage was observed.
• Wind breaks were present along disturbed areas.
• Sandbags were used to protect storm drains and manholes.
• The site was not inactive long enough to require stabilization.
• Post-construction vegetation planting was not applicable.

Traffic and Utilities
• No bus stop closures occurred.
• No traffic control plan was implemented
• No damage to roads, sidewalks, or trails was observed.
• Utilities were marked prior to construction.

Include corrective actions recommended.
Install CPUC dust complaint signage at Grove / Fairgrounds.
For minor problems or higher include the following:

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Location of buffer around cultural finds at Skyline terminal.



Deliveries at Fairgrounds.

Kendra Hartmann 5/05/2026

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ESA Monitors **Date**

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Power Santa Clara Valley

Compliance Monitoring Log

Date: 5/07/2026 **Time:** 9:30AM-12:00PM

Report Code: PSCV20260430_SD

Project Site: Grove Terminal, Santa Clara Fairgrounds, and Skyline Terminal

Compliance Level:

Acceptable ☒ Minor Corrective Action ☒ Non-Compliance ☐
Minor Problem ☐ Violation ☐

Compliance Advisory or Non-Compliance form attached Yes ☐ No ☒

Photo Documentation Yes ☒ No ☐

Type of Monitoring:

Mitigation ☒ Spot-check ☐ SWPPP inspection ☐
Biological ☐ Re-inspection ☐

Construction Activity(s) Being Monitored:

- Site preparation (grinding / asphalt removal) for Skyline Terminal. Deliveries of project supplies at Santa Clara Fairgrounds. Site preparation (grinding / asphalt removal) at Grove Terminal.

General Summary of Mitigation Compliance and Site Conditions:

Describe site conditions

- Clear skies. No wind at Skyline, Grove terminals, and Santa Clara Fairgrounds.

Biological Resources
• All workers present received WEAP training.
• No sensitive biological resources or seasonal restrictions affected today's work.
• No protected bird species, nests, or buffers were present. AECOM monitor on site for active bird nests near access gate.
• Vehicles entered the site clean and biological BMPs were implemented.
• No excavations or trenches were present that could pose wildlife hazards.
• Outdoor lighting was not in use.
• No work impacting wetlands or other jurisdictional waters occurred.
• No directional drilling or frac-out activities occurred.
• Tree removal occurred at Grove terminals with AECOM biologist present.

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Cultural and Paleontological Resources
• Possible cultural resources identified, cultural monitor / lead on site and area barricaded off.
• No paleontological resources were encountered.
• Work was not within State Lands jurisdiction, and no submerged cultural resources were present.

Soil and Groundwater
• Vehicles and equipment remained within approved work limits.
• Construction did not occur in saturated soil conditions (topsoil was wet).
• Cleared and grubbed materials were stockpiled within the active work area and covered.
• Removed vegetation remained onsite.
• Excavated materials were handled in accordance with the Soil and Groundwater Management Plan.
• No groundwater was encountered.

Hazardous Materials
• Secondary containment meeting SPCC requirements was present.
• No work occurred within restricted use or Superfund areas.

Air Quality
• All construction equipment onsite met Tier 4 fleet requirements.
• Dust control watering was observed consistent with BMPs.
• No haul trucks transported material offsite.
• No track-out was observed; prior street sweeping was noted.
• Vehicles adhered to approved speed limits.
• Wind speeds remained below the 20-mph threshold.
• Construction equipment idled less than 5 minutes.
• CPUC dust complaint signage was observed – **Temporary dust complaint signage was observed at Skyline Terminal and still waiting delivery of signs for Grove and Santa Clara Fairgrounds Terminal.**
• Wind breaks were present along disturbed areas.
• Sandbags were used to protect storm drains and manholes.
• The site was not inactive long enough to require stabilization.
• Post-construction vegetation planting was not applicable.

Traffic and Utilities
• No bus stop closures occurred.
• No traffic control plan was implemented
• No damage to roads, sidewalks, or trails was observed.
• Utilities were marked prior to construction.

Include corrective actions recommended.
Install CPUC dust complaint signage at Grove / Fairgrounds.
For minor problems or higher include the following:

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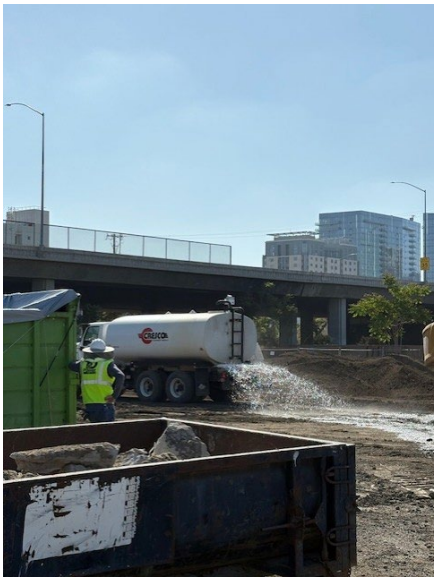

Watering / dust abatement at Skyline terminal.



All dumpsters covered at Skyline terminal.

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Dust control at Grove / covered trenching.



50’ Nest buffer in place for Grove site (AECOM monitor on site).

Stephen Doyle 4/30/2026

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ESA Monitors **Date**

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Power Santa Clara Valley

Compliance Monitoring Log

Date: 5/12/2026 **Time:** 1:00PM-3:00PM

Report Code: PSCV20260512_AJH

Project Site: Grove Terminal, Santa Clara Fairgrounds, and Skyline Terminal

Compliance Level:

Acceptable ☒ Minor Corrective Action ☐ Non-Compliance ☐
Minor Problem ☐ Violation ☐

Compliance Advisory or Non-Compliance form attached Yes ☐ No ☒

Photo Documentation Yes ☒ No ☐

Type of Monitoring:

Mitigation ☒ Spot-check ☐ SWPPP inspection ☐
Biological ☐ Re-inspection ☐

Construction Activity(s) Being Monitored:

- Dumping concrete in dumpster and moving dirt around at Skyline Terminal as well as waiting on soil testing to remove soil off site.
- Deliveries and site maintenance conducted at Santa Clara Fairgrounds.
- Lane marking and asphalt cutting at Vault 7.
- Asphalt cutting and tree trimming at Vault 5.
- Site clean-up and excavating foundation and digging south retention pond for drainage at Grove Terminal.

General Summary of Mitigation Compliance and Site Conditions:

Describe site conditions

- Clear and sunny skies. Light wind at Skyline, Grove terminals, and Santa Clara Fairgrounds.

Biological Resources

• All workers present received WEAP training.
• No sensitive biological resources or seasonal restrictions affected today's work.
• No protected bird species, nests, or buffers were present.
• Vehicles entered the site clean and biological BMPs were implemented.
• No excavations or trenches were present that could pose wildlife hazards.
• Outdoor lighting was not in use.

• No work impacting wetlands or other jurisdictional waters occurred.
• No directional drilling or frac-out activities occurred.
• Tree removal occurred at Grove terminals with AECOM biologist present.

Cultural and Paleontological Resources
• No cultural resources issues were identified; no monitoring was required.
• No paleontological resources were encountered.
• Work was not within State Lands jurisdiction, and no submerged cultural resources were present.

Soil and Groundwater
• Vehicles and equipment remained within approved work limits.
• Construction did not occur in saturated soil conditions (topsoil was wet).
• Cleared and grubbed materials were stockpiled within the active work area and covered.
• Removed vegetation remained onsite.
• Excavated materials were handled in accordance with the Soil and Groundwater Management Plan.
• No groundwater was encountered.

Hazardous Materials
• Secondary containment meeting SPCC requirements was present.
• No work occurred within restricted use or Superfund areas.

Air Quality
• All construction equipment onsite met Tier 4 fleet requirements.
• Dust control watering was observed consistent with BMPs.
• No haul trucks transported material offsite.
• No track-out was observed; prior street sweeping was noted.
• Vehicles adhered to approved speed limits.
• Wind speeds remained below the 20-mph threshold.
• Construction equipment idled less than 5 minutes.
• CPUC dust complaint signage was observed.
• Wind breaks were present along disturbed areas.
• Sandbags were used to protect storm drains and manholes.
• The site was not inactive long enough to require stabilization.
• Post-construction vegetation planting was not applicable.

Traffic and Utilities
• No bus stop closures occurred.
• No traffic control plan was implemented; nearby dealership test driving was noted as a concern.
• No damage to roads, sidewalks, or trails was observed.
• Utilities were marked prior to construction.

Include corrective actions recommended.
N/A

For minor problems or higher include the following:
• Concern about high-speed traffic from nearby dealerships

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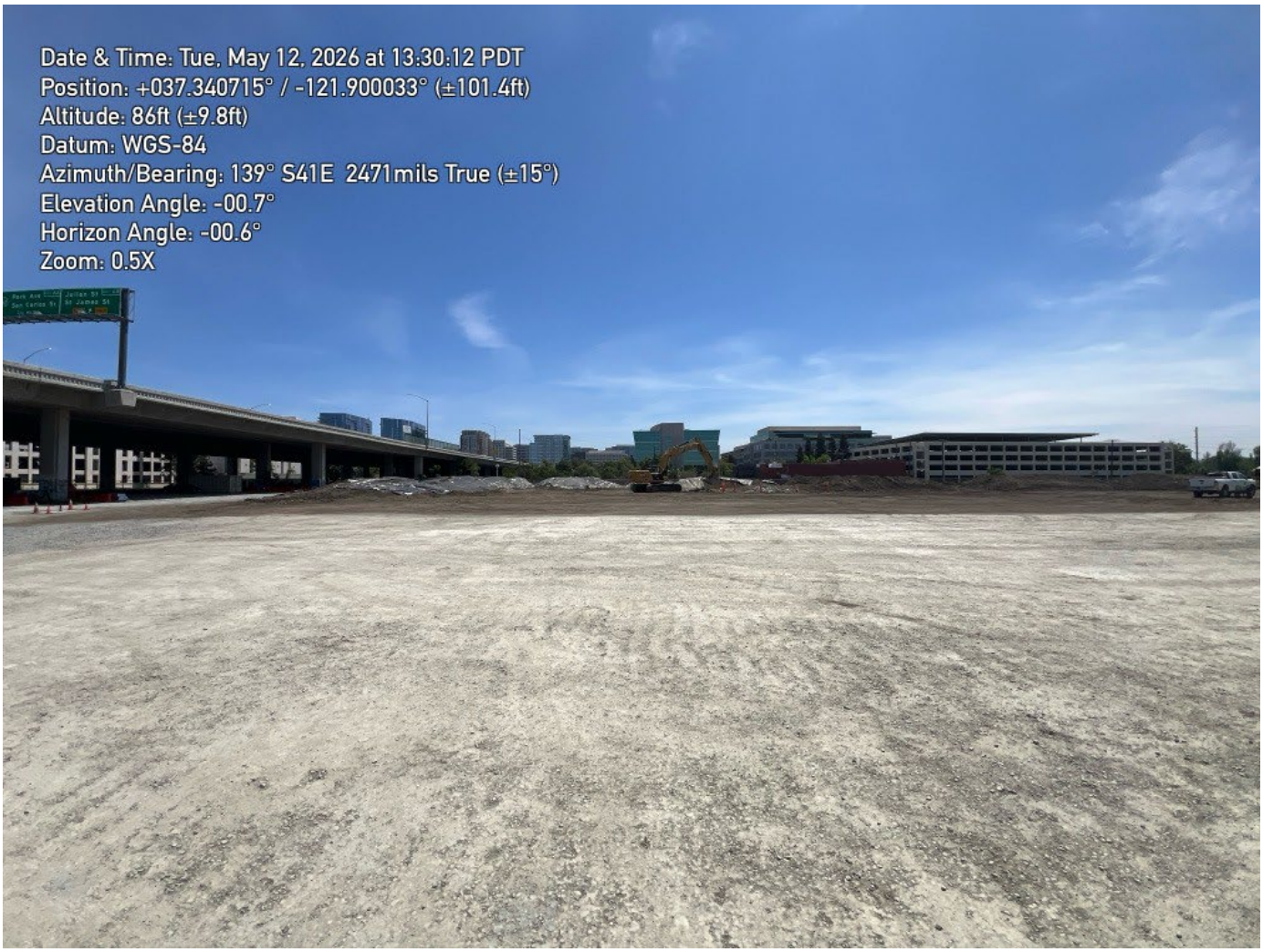

Compacting soil at Skyline Terminal site.

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Multiple deliveries conducted at Santa Clara Fairgrounds.

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Asphalt cut into the road at Vault 7.

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Continuing to asphalt cut into the road at Vault 5.

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Excavating ground for foundation for building at Grove Terminal Site.

Alicia J Herbert, 5/12/2026
ESA Monitors

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Power Santa Clara Valley

Compliance Monitoring Log

Date: 05/14/2026 **Time:** 13:05-15:28

Project Site:

- Skyline Terminal
  - **Activities:** Soil hauling
- Vault 4
  - **Activities:** Vault install
- Grove terminal
  - **Activities:** offhauling / cultural – arch monitoring
- Fairgrounds
  - **Activities:** Staging Yard Preparation

Compliance Level:

Acceptable ☒ Minor Corrective Action ☐ Non-Compliance ☐
Minor Problem ☐ Violation ☐

Compliance Advisory or Non-Compliance form attached Yes ☐ No ☒

Photo Documentation Yes ☒ No ☐

Type of Monitoring:

Mitigation ☒ Spot-check ☐ SWPPP inspection ☐
Biological ☐ Re-inspection ☐

General Summary of Mitigation Compliance and Site Conditions:

Describe site conditions

- Conditions: clear sky
- Wind Speed: 3.580000

Include examples of positive compliance

Measure(s)	In Compliance?
APM BIO-9: Worker Environmental Awareness (WEAP) Training	**Yes**
Mitigation Measure 3.4-1e: Construction Worker Environmental Awareness Training Program (WEAP)	
APM BIO-2 Rare Plant Surveys	**Yes**
APM BIO-7: Salt Marsh Harvest Mouse Surveys	
APM BIO-4: Sensitive Area Demarcation	
APM BIO-17: Wetland, Vernal Pool, and Waterway Construction Timing	

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Restrictions	
Mitigation Measure 3.4-1a: Avoid Impacts to Rare Plants	
Mitigation Measure 3.4-1d: Protection of Special-Status Wildlife	
APM BIO-11: Special-status Bird Surveys	**Yes**
APM BIO-5: Vehicle Cleaning Prior to Entering Natural Areas	**Yes**
APM BIO-8: Excavation Wildlife Safety Best Management Practices	**Yes**
APM BIO-10: Outdoor Lighting Measures	**Yes**
Mitigation Measure 3.1-2: Minimize Fugitive Light from Temporary Sources Used for Construction	
Mitigation Measure 3.4-1b: Habitat Restoration and Monitoring	**Yes**
Mitigation Measure 3.4-1c: Frac-out Plan	**Yes**
Mitigation Measure 3.4-5: Compliance with Local Tree Ordinances	**Yes**
APM CUL-2: Archaeological and Native American Monitoring	**Yes**
APM CUL-4: Cultural Resources Inventory	
APM TCR-2: Native American Monitoring	
Mitigation Measure 3.5-1: Archaeological Monitoring Plan	
APM PALEO-2: Paleontological Resources Findings	**Yes**
Mitigation Measure 3.5-2: Unanticipated Discovery of Submerged Cultural Resources	**Yes**
APM GEO-1: Geotechnical Studies and Geologic Hazard Reduction Measures	**Yes**
Mitigation Measure 3.9-1c: Soil and Groundwater Management Plan	
APM WQ-1: Groundwater Dewatering and Discharge Measures	
APM HAZ-1: Site-Specific Spill Prevention, Control, and Countermeasure Plan	**Yes**
APM HAZ-3: Compliance with the Covenant to Restrict Use of Property	**Yes**
APM HAZ-4: Compliance with the Covenant and Agreement for Environmental Restriction	
Mitigation Measure 3.9-1a: Pre-Construction Hazardous Materials Assessment	
Mitigation Measure 3.3-2a: Construction Fleet Minimum Requirements and Tracking – Tier 4 Final Emissions Controls	**Yes**
Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions	**Yes**
APM TRA-2: Coordinate Bus Stop Closures	**Yes**
Mitigation Measure 3.17-2a: Implement Coordinated Traffic Control Plan	
Mitigation Measure 3.17-2b: Infrastructure Repair Reporting	
APM UTIL-1: Coordination with Utilities	

Biological Resources

- All workers present received WEAP training.
- No sensitive biological resources or seasonal restrictions affected today's work.
- No protected bird species, nests, or buffers were present.
- Vehicles entered the site clean and biological BMPs were implemented.
- No excavations or trenches were present that could pose wildlife hazards.
- Outdoor lighting was not in use.
- No work impacting wetlands or other jurisdictional waters occurred.

• No directional drilling or frac-out activities occurred.
• No tree removal activities occurred.

Cultural and Paleontological Resources
• Cultural resources identified, protocol followed.
• Paleontological monitor on site.
• Work was not within State Lands jurisdiction and no submerged cultural resources were present.

Soil and Groundwater
• Vehicles and equipment remained within approved work limits.
• Construction did not occur in saturated soil conditions
• Cleared and grubbed materials were stockpiled within the active work area and covered.
• Removed vegetation remained onsite.
• Excavated materials were handled in accordance with the Soil and Groundwater Management Plan.
• No groundwater was encountered.

Hazardous Materials
• Secondary containment meeting SPCC requirements was present.
• No work occurred within restricted use or Superfund areas.

Air Quality
• All construction equipment onsite met Tier 4 fleet requirements.
• Dust control watering was observed consistent with BMPs.
• Haul trucks transporting material offsite using covers.
• No track-out was observed; street sweeping planned for later in afternoon
• Vehicles adhered to approved speed limits.
• Wind speeds remained below the 20-mph threshold.
• Construction equipment was not observed today idling longer than 5 minutes.
• CPUC dust complaint signage was observed. Permanent signage installed. Signage at all active sites observed
• Wind breaks were present along disturbed areas.
• Sandbags were used to protect storm drains and manholes.
• The site was not inactive long enough to require stabilization.
• Post-construction vegetation planting was not applicable.

Traffic and Utilities
• No bus stop closures occurred.
• Traffic control plan was implemented
• No damage to roads, sidewalks, or trails was observed.
• Utilities were marked prior to construction.

For minor problems or higher include the following:
N/A
Include corrective actions recommended.
N/A

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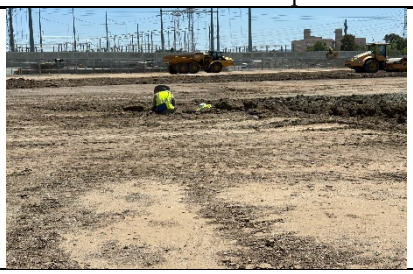
Grove – covered dumpsters



Grove – water truck for dust abatement observed



Grove – cultural / arch team on site



Grove – cultural / arch team on site



Grove – wattling / perimeter fence in place



Grove – bird buffer in place



Grove – trackout pads in place



Grove – drip pans under equipment

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Vault 4 – Vault covers in place



Vault 4 – Drip pans in place



Vault 4 – secondary containment under portopotty



Vault 4 – shoring work for vault / safety measures in place



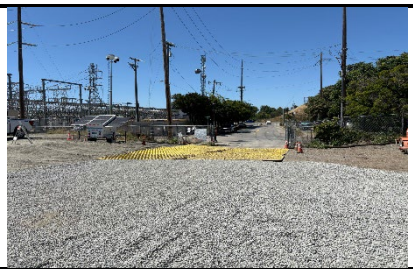
Vault 4 – drip pan under light generator



Vault 4 – vault materials



Vault 4 – Shoring work



Skyline – trackout pads / street sweeping observed



Skyline – excavator active with monitors present



Skyline – covered dumpster

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Skyline – water truck / dust abatement observed


Skyline – excavators with drip pans in place


Skyline – backfill pile (active)


Skyline – Backfill berms in place


Skyline – perimeter fencing / wattling in place


Skyline – Backfill berms in place


Skyline – Perimter fencing


Skyline – debris area blocked off


Skyline – Parking area with gravel laid down


Skyline – trench coverings observed. Stockpile coverings observed

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Skyline – Locked arch / cultural container

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Power Santa Clara Valley

Compliance Monitoring Log

Date: 05/20/2026 **Time:** 09:45-12:15

Monitor: Kendra Hartmann

Project Site:

- Skyline – trenching, soil testing done, still waiting on results; uncovered soil piles to be covered by next day; replace silt fencing
- Grove - asphalt chipping; first layer of excavation done; dust control; concrete offhauling; 2 new active bird nests in trees near front gate; compaction testing
- Vault 7 – lifting, dewatering (none needed), lowering of upper/lower portions, backfill.
    - **Activities:** Trenching (including utility work)

Compliance Level:

Acceptable ☒	Minor Corrective Action ☐	Non-Compliance ☐
	Minor Problem ☐	Violation ☐

Compliance Advisory or Non-Compliance form attached Yes ☐ No ☐

Photo Documentation Yes ☒ No ☐

Type of Monitoring:

Mitigation ☒	Spot-check ☐	SWPPP inspection ☐
Biological ☐	Re-inspection ☐	

General Summary of Mitigation Compliance and Site Conditions:

Describe site conditions

- Conditions: clear sky
- Wind Speed: 1.400000

Include examples of positive compliance

Measure(s)	In Compliance?
APM BIO-9: Worker Environmental Awareness (WEAP) Training	**Yes**
Mitigation Measure 3.4-1e: Construction Worker Environmental Awareness Training Program (WEAP)	**Notes:** New workers received training
APM BIO-2 Rare Plant Surveys	**Yes**
APM BIO-7: Salt Marsh Harvest Mouse Surveys	
APM BIO-4: Sensitive Area Demarcation	
APM BIO-17: Wetland, Vernal Pool, and Waterway Construction Timing Restrictions	

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Mitigation Measure 3.4-1a: Avoid Impacts to Rare Plants **Mitigation Measure 3.4-1d: Protection of Special-Status Wildlife** **APM BIO-11: Special-status Bird Surveys**	**Yes** **Notes:** Active nests by site access were marked with 50' buffer. Crews stayed outside edge.
APM BIO-5: Vehicle Cleaning Prior to Entering Natural Areas	**Yes**
APM BIO-8: Excavation Wildlife Safety Best Management Practices	**Yes** **Notes:** Open hole at Fairgrounds was covered
APM BIO-10: Outdoor Lighting Measures **Mitigation Measure 3.1-2: Minimize Fugitive Light from Temporary Sources Used for Construction**	**Yes**
Mitigation Measure 3.4-1b: Habitat Restoration and Monitoring	**Yes**
Mitigation Measure 3.4-1c: Frac-out Plan	**Yes**
Mitigation Measure 3.4-5: Compliance with Local Tree Ordinances	**Yes** **Notes:** Tree removal at Grove complete
APM CUL-2: Archaeological and Native American Monitoring **APM CUL-4: Cultural Resources Inventory** **APM TCR-2: Native American Monitoring** **Mitigation Measure 3.5-1: Archaeological Monitoring Plan** **APM PALEO-2: Paleontological Resources Findings**	**Yes** **Notes:** Cultural monitor on site at Skyline **Yes** **Notes:** Cultural area still sectioned off in corner of Skyline
Mitigation Measure 3.5-2: Unanticipated Discovery of Submerged Cultural Resources	**Yes**
APM GEO-1: Geotechnical Studies and Geologic Hazard Reduction Measures **Mitigation Measure 3.9-1c: Soil and Groundwater Management Plan** **APM WQ-1: Groundwater Dewatering and Discharge Measures**	**Yes**
APM HAZ-1: Site-Specific Spill Prevention, Control, and Countermeasure Plan	**Yes**
APM HAZ-3: Compliance with the Covenant to Restrict Use of Property	**Yes**
APM HAZ-4: Compliance with the Covenant and Agreement for Environmental Restriction **Mitigation Measure 3.9-1a: Pre-Construction Hazardous Materials Assessment**	
Mitigation Measure 3.3-2a: Construction Fleet Minimum Requirements and Tracking – Tier 4 Final Emissions Controls	**Yes**
Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions	**Yes**
APM TRA-2: Coordinate Bus Stop Closures	**Yes**
Mitigation Measure 3.17-2a: Implement Coordinated Traffic Control Plan	

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Mitigation Measure 3.17-2b: Infrastructure Repair Reporting
APM UTIL-1: Coordination with Utilities

Biological Resources
• All workers present received WEAP training.
• No sensitive biological resources or seasonal restrictions affected today's work.
• No protected bird species, nests, or buffers were present.
• Vehicles entered the site clean and biological BMPs were implemented.
• No excavations or trenches were present that could pose wildlife hazards.
• Outdoor lighting was not in use.
• No work impacting wetlands or other jurisdictional waters occurred.
• No directional drilling or frac-out activities occurred.
• No tree removal activities occurred.

Cultural and Paleontological Resources
• No cultural resources issues were identified; no monitoring was required.
• No paleontological resources were encountered. Paleontological monitor on site.
• Work was not within State Lands jurisdiction and no submerged cultural resources were present.

Soil and Groundwater
• Vehicles and equipment remained within approved work limits.
• Construction did not occur in saturated soil conditions
• Cleared and grubbed materials were stockpiled within the active work area and covered.
• Removed vegetation remained onsite.
• Excavated materials were handled in accordance with the Soil and Groundwater Management Plan.
• No groundwater was encountered.

Hazardous Materials
• Secondary containment meeting SPCC requirements was present.
• No work occurred within restricted use or Superfund areas.

Air Quality
• All construction equipment onsite met Tier 4 fleet requirements.
• Dust control watering was observed consistent with BMPs.
• Haul trucks transporting material offsite using covers.
• No track-out was observed; street sweeping planned for later in afternoon
• Vehicles adhered to approved speed limits.
• Wind speeds remained below the 20-mph threshold.
• Construction equipment was not observed today idling longer than 5 minutes.
• CPUC dust complaint signage was observed. Permanent signage installed. Signage at all active sites observed
• Wind breaks were present along disturbed areas.
• Sandbags were used to protect storm drains and manholes.
• The site was not inactive long enough to require stabilization.
• Post-construction vegetation planting was not applicable.

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Traffic and Utilities
• No bus stop closures occurred.
• Traffic control plan was implemented
• No damage to roads, sidewalks, or trails was observed.
• Utilities were marked prior to construction.

For minor problems or higher include the following:

Include corrective actions recommended.

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Nest buffer at Grove



Drip pan



Vault 7 trench



Signage at Vault 7



Work at Vault 7



Water hauling at Fairgrounds

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Power Santa Clara Valley

Compliance Monitoring Log

Date: 05/21/2026 **Time:** 09:34-12:04

Project Site:

- Skyline - trenching. Grove - asphalt chipping
  - **Activities:** Trenching (including utility work)

Compliance Level:

Acceptable ☐ Minor Corrective Action ☐ Non-Compliance ☐
Minor Problem ☐ Violation ☐

Compliance Advisory or Non-Compliance form attached Yes ☐ No ☐

Photo Documentation Yes ☐ No ☐

Type of Monitoring:

Mitigation ☒ Spot-check ☐ SWPPP inspection ☐
Biological ☐ Re-inspection ☐

General Summary of Mitigation Compliance and Site Conditions:

Describe site conditions

- Conditions: clear sky
- Wind Speed: 1.400000

Include examples of positive compliance

Measure(s)	In Compliance?
APM BIO-9: Worker Environmental Awareness (WEAP) Training	**Yes**
Mitigation Measure 3.4-1e: Construction Worker Environmental Awareness Training Program (WEAP)	**Notes:** New workers received training
APM BIO-2 Rare Plant Surveys	**Yes**
APM BIO-7: Salt Marsh Harvest Mouse Surveys	
APM BIO-4: Sensitive Area Demarcation	
APM BIO-17: Wetland, Vernal Pool, and Waterway Construction Timing Restrictions	
Mitigation Measure 3.4-1a: Avoid Impacts to Rare Plants	
Mitigation Measure 3.4-1d: Protection of Special-Status Wildlife	
APM BIO-11: Special-status Bird Surveys	**Yes** **Notes:** Active nests by site access were marked with 50’

	buffer. Crews stayed outside edge.
APM BIO-5: Vehicle Cleaning Prior to Entering Natural Areas	**Yes**
APM BIO-8: Excavation Wildlife Safety Best Management Practices	**Yes** **Notes:** Open hole at Fairgrounds was covered
APM BIO-10: Outdoor Lighting Measures	**Yes**
Mitigation Measure 3.1-2: Minimize Fugitive Light from Temporary Sources Used for Construction	
Mitigation Measure 3.4-1b: Habitat Restoration and Monitoring	**Yes**
Mitigation Measure 3.4-1c: Frac-out Plan	**Yes**
Mitigation Measure 3.4-5: Compliance with Local Tree Ordinances	**Yes** **Notes:** Tree removal at Grove complete
APM CUL-2: Archaeological and Native American Monitoring	**Yes**
APM CUL-4: Cultural Resources Inventory	**Notes:** Cultural
APM TCR-2: Native American Monitoring	monitor on site at
Mitigation Measure 3.5-1: Archaeological Monitoring Plan	Skyline
APM PALEO-2: Paleontological Resources Findings	**Yes** **Notes:** Cultural area still sectioned off in corner of Skyline
Mitigation Measure 3.5-2: Unanticipated Discovery of Submerged Cultural Resources	**Yes**
APM GEO-1: Geotechnical Studies and Geologic Hazard Reduction Measures	**Yes**
Mitigation Measure 3.9-1c: Soil and Groundwater Management Plan	
APM WQ-1: Groundwater Dewatering and Discharge Measures	
APM HAZ-1: Site-Specific Spill Prevention, Control, and Countermeasure Plan	**Yes**
APM HAZ-3: Compliance with the Covenant to Restrict Use of Property	**Yes**
APM HAZ-4: Compliance with the Covenant and Agreement for Environmental Restriction	
Mitigation Measure 3.9-1a: Pre-Construction Hazardous Materials Assessment	
Mitigation Measure 3.3-2a: Construction Fleet Minimum Requirements and Tracking – Tier 4 Final Emissions Controls	**Yes**
Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions	**Yes**
APM TRA-2: Coordinate Bus Stop Closures	**Yes**
Mitigation Measure 3.17-2a: Implement Coordinated Traffic Control Plan	
Mitigation Measure 3.17-2b: Infrastructure Repair Reporting	
APM UTIL-1: Coordination with Utilities	

Biological Resources

- All workers present received WEAP training.

• No sensitive biological resources or seasonal restrictions affected today's work.
• No protected bird species, nests, or buffers were present.
• Vehicles entered the site clean and biological BMPs were implemented.
• No excavations or trenches were present that could pose wildlife hazards.
• Outdoor lighting was not in use.
• No work impacting wetlands or other jurisdictional waters occurred.
• No directional drilling or frac-out activities occurred.
• No tree removal activities occurred.

Cultural and Paleontological Resources
• No cultural resources issues were identified; no monitoring was required.
• No paleontological resources were encountered. Paleontological monitor on site.
• Work was not within State Lands jurisdiction and no submerged cultural resources were present.

Soil and Groundwater
• Vehicles and equipment remained within approved work limits.
• Construction did not occur in saturated soil conditions
• Cleared and grubbed materials were stockpiled within the active work area and covered.
• Removed vegetation remained onsite.
• Excavated materials were handled in accordance with the Soil and Groundwater Management Plan.
• No groundwater was encountered.

Hazardous Materials
• Secondary containment meeting SPCC requirements was present.
• No work occurred within restricted use or Superfund areas.

Air Quality
• All construction equipment onsite met Tier 4 fleet requirements.
• Dust control watering was observed consistent with BMPs.
• Haul trucks transporting material offsite using covers.
• No track-out was observed; street sweeping planned for later in afternoon
• Vehicles adhered to approved speed limits.
• Wind speeds remained below the 20-mph threshold.
• Construction equipment was not observed today idling longer than 5 minutes.
• CPUC dust complaint signage was observed. Permanent signage installed. Signage at all active sites observed
• Wind breaks were present along disturbed areas.
• Sandbags were used to protect storm drains and manholes.
• The site was not inactive long enough to require stabilization.
• Post-construction vegetation planting was not applicable.

Traffic and Utilities
• No bus stop closures occurred.
• Traffic control plan was implemented
• No damage to roads, sidewalks, or trails was observed.
• Utilities were marked prior to construction.

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Include corrective actions recommended.

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Photo 1.

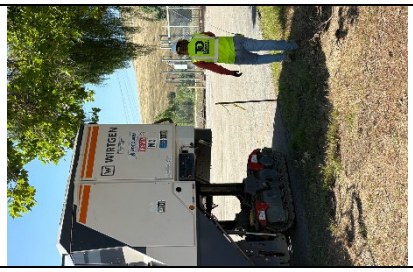

Photo 2.



Photo 3.



Photo 4.



Photo 5.



Photo 6.



Photo 7.



Photo 8.

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Photo 9.

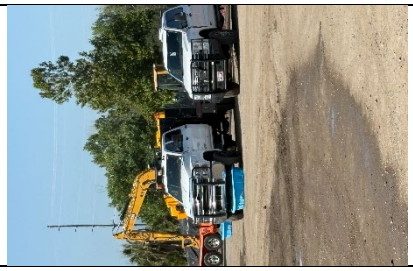
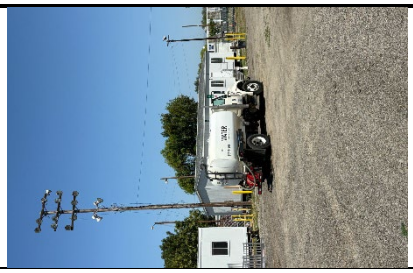


Photo 10.



Photo 11.



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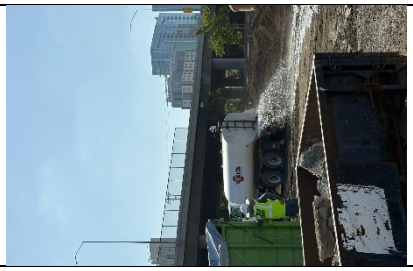

Photo 13.



Photo 14.

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Power Santa Clara Valley

Compliance Monitoring Log

Date: 5/27/2026 **Time:** 8:30AM-11:30AM

Report Code: PSCV20260527_AJH

Project Site: Grove Terminal, Santa Clara Fairgrounds, and Skyline Terminal

Compliance Level:

Acceptable ☒ Minor Corrective Action ☐ Non-Compliance ☐
Minor Problem ☐ Violation ☐

Compliance Advisory or Non-Compliance form attached Yes ☐ No ☒

Photo Documentation Yes ☒ No ☐

Type of Monitoring:

Mitigation ☒ Spot-check ☐ SWPPP inspection ☐
Biological ☐ Re-inspection ☐

Construction Activity(s) Being Monitored:

- Soil testing at Skyline came back positive with mercury. Approximately 15 haul trucks are on site to remove soil from soil piles. Soil piles were sprayed with tech fire.
- Deliveries are still conducted at Santa Clara Fairgrounds. Transporting k-rails from vaults 5 and 7 to Fairgrounds before transporting them to vaults 4 and 8.
- Site maintenance and clean up at vault 7.
- Site maintenance and clean up at vault 5. Dismantling vault 5 and moving k-rails to Fairgrounds.
- Completed excavation for convertible haul building. Hydraulic fluid from equipment that was leaking into soil was contained by placing a kiddy pool underneath equipment. Crew removed contaminated soil from ground and placed it into 10-gallon barrel.

General Summary of Mitigation Compliance and Site Conditions:

Describe site conditions

- Clear and sunny skies. Light wind at Skyline, Grove terminals, and Santa Clara Fairgrounds.

Biological Resources

• All workers present received WEAP training.
• No sensitive biological resources or seasonal restrictions affected today's work.
• No protected bird species, nests, or buffers were present.

• Vehicles entered the site clean and biological BMPs were implemented.
• No excavations or trenches were present that could pose wildlife hazards.
• Outdoor lighting was not in use.
• No work impacting wetlands or other jurisdictional waters occurred.
• No directional drilling or frac-out activities occurred.
• Tree removal occurred at Grove terminals with AECOM biologist present.

Cultural and Paleontological Resources
• No cultural resources issues were identified; no monitoring was required.
• No paleontological resources were encountered.
• Work was not within State Lands jurisdiction, and no submerged cultural resources were present.

Soil and Groundwater
• Vehicles and equipment remained within approved work limits.
• Construction did not occur in saturated soil conditions (topsoil was wet). – **Previous hydraulic leak from equipment into soil was cleaned and contained into a 10-gallon barrel. Section of topsoil is now dry.**
• Cleared and grubbed materials were stockpiled within the active work area and covered.
• Removed vegetation remained onsite.
• Excavated materials were handled in accordance with the Soil and Groundwater Management Plan.
• No groundwater was encountered.

Hazardous Materials
• Secondary containment meeting SPCC requirements was present.
• No work occurred within restricted use or Superfund areas.

Air Quality
• All construction equipment onsite met Tier 4 fleet requirements.
• Dust control watering was observed consistent with BMPs.
• Haul trucks transported material offsite. – **Multiple haul trucks transporting soil offsite at Skyline. Cover on back of truck was installed to contain soil for dust control**.
• No track-out was observed; prior street sweeping was noted.
• Vehicles adhered to approved speed limits.
• Wind speeds remained below the 20-mph threshold.
• Construction equipment idled less than 5 minutes.
• CPUC dust complaint signage was observed.
• Wind breaks were present along disturbed areas.
• Sandbags were used to protect storm drains and manholes.
• The site was not inactive long enough to require stabilization.
• Post-construction vegetation planting was not applicable.

Traffic and Utilities
• No bus stop closures occurred.
• No traffic control plan was implemented; nearby dealership test driving was noted as a concern.
• No damage to roads, sidewalks, or trails was observed.
• Utilities were marked prior to construction.

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Include corrective actions recommended.
N/A

For minor problems or higher include the following:
- Concern about high-speed traffic from nearby dealerships



Removing soil offsite at Skyline.

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Delivering k-rails from vault 5 and 7 at Santa Clara Fairgrounds.

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Completed installment at vault 7.

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Completed installment at vault 5.

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Hydraulic fluid leak that contaminated soil has been contained in a 10-gallon barrel at Grove.

Alicia J Herbert, 5/27/2026

ESA Monitors

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Power Santa Clara Valley

Compliance Monitoring Log

Date: 05/28/2026 **Time:** 09:55-12:09

Project Site:

- Fairgrounds - vault supply deliveries
  - **Activities:** Staging Yard Preparation
- Skyline – Excavation
  - **Activities:** Soil offhauling / cultural team on site
- Vault 8
  - **Activities:** Vault install work
- Grove – No activity
  - **Activities:** N/A

Compliance Level:

Acceptable ☒ Minor Corrective Action ☐ Non-Compliance ☐
Minor Problem ☐ Violation ☐

Compliance Advisory or Non-Compliance form attached Yes ☐ No ☒

Photo Documentation Yes ☒ No ☐

Type of Monitoring:

Mitigation ☒ Spot-check ☐ SWPPP inspection ☐
Biological ☐ Re-inspection ☐

General Summary of Mitigation Compliance and Site Conditions:

Describe site conditions

- Conditions: clear sky
- Wind Speed: 1.790000

Include examples of positive compliance

Measure(s)	In Compliance?
APM BIO-9: Worker Environmental Awareness (WEAP) Training	**Yes**
Mitigation Measure 3.4-1e: Construction Worker Environmental Awareness Training Program (WEAP)	
APM BIO-2 Rare Plant Surveys	**Yes**
APM BIO-7: Salt Marsh Harvest Mouse Surveys	
APM BIO-4: Sensitive Area Demarcation	
APM BIO-17: Wetland, Vernal Pool, and Waterway Construction Timing	

Restrictions	
Mitigation Measure 3.4-1a: Avoid Impacts to Rare Plants	
Mitigation Measure 3.4-1d: Protection of Special-Status Wildlife	
APM BIO-11: Special-status Bird Surveys	**Yes**
APM BIO-5: Vehicle Cleaning Prior to Entering Natural Areas	**Yes**
APM BIO-8: Excavation Wildlife Safety Best Management Practices	**Yes**
APM BIO-10: Outdoor Lighting Measures	**Yes**
Mitigation Measure 3.1-2: Minimize Fugitive Light from Temporary Sources Used for Construction	
Mitigation Measure 3.4-1b: Habitat Restoration and Monitoring	**Yes**
Mitigation Measure 3.4-1c: Frac-out Plan	**Yes**
Mitigation Measure 3.4-5: Compliance with Local Tree Ordinances	**Yes**
APM CUL-2: Archaeological and Native American Monitoring	**Yes**
APM CUL-4: Cultural Resources Inventory	
APM TCR-2: Native American Monitoring	
Mitigation Measure 3.5-1: Archaeological Monitoring Plan	
APM PALEO-2: Paleontological Resources Findings	**Yes**
Mitigation Measure 3.5-2: Unanticipated Discovery of Submerged Cultural Resources	**Yes**
APM GEO-1: Geotechnical Studies and Geologic Hazard Reduction Measures	**Yes**
Mitigation Measure 3.9-1c: Soil and Groundwater Management Plan	
APM WQ-1: Groundwater Dewatering and Discharge Measures	
APM HAZ-1: Site-Specific Spill Prevention, Control, and Countermeasure Plan	**Yes**
APM HAZ-3: Compliance with the Covenant to Restrict Use of Property	**Yes**
APM HAZ-4: Compliance with the Covenant and Agreement for Environmental Restriction	
Mitigation Measure 3.9-1a: Pre-Construction Hazardous Materials Assessment	
Mitigation Measure 3.3-2a: Construction Fleet Minimum Requirements and Tracking – Tier 4 Final Emissions Controls	**Yes**
Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions	**Yes**
APM TRA-2: Coordinate Bus Stop Closures	**Yes**
Mitigation Measure 3.17-2a: Implement Coordinated Traffic Control Plan	
Mitigation Measure 3.17-2b: Infrastructure Repair Reporting	
APM UTIL-1: Coordination with Utilities	
APM BIO-2 Rare Plant Surveys	**Yes**
APM BIO-7: Salt Marsh Harvest Mouse Surveys	
APM BIO-4: Sensitive Area Demarcation	
APM BIO-17: Wetland, Vernal Pool, and Waterway Construction Timing Restrictions	
Mitigation Measure 3.4-1a: Avoid Impacts to Rare Plants	
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APM BIO-11: Special-status Bird Surveys	**Yes**
APM BIO-5: Vehicle Cleaning Prior to Entering Natural Areas	**Yes**
APM BIO-8: Excavation Wildlife Safety Best Management Practices	**Yes**

APM BIO-10: Outdoor Lighting Measures	**Yes**
Mitigation Measure 3.1-2: Minimize Fugitive Light from Temporary Sources Used for Construction	
Mitigation Measure 3.4-1b: Habitat Restoration and Monitoring	**Yes**
Mitigation Measure 3.4-1c: Frac-out Plan	**Yes**
Mitigation Measure 3.4-5: Compliance with Local Tree Ordinances	**Yes**
APM CUL-2: Archaeological and Native American Monitoring	**Yes**
APM CUL-4: Cultural Resources Inventory	
APM TCR-2: Native American Monitoring	
Mitigation Measure 3.5-1: Archaeological Monitoring Plan	
APM PALEO-2: Paleontological Resources Findings	**Yes**
Mitigation Measure 3.5-2: Unanticipated Discovery of Submerged Cultural Resources	**Yes**
APM GEO-1: Geotechnical Studies and Geologic Hazard Reduction Measures	**Yes**
Mitigation Measure 3.9-1c: Soil and Groundwater Management Plan	
APM WQ-1: Groundwater Dewatering and Discharge Measures	
APM HAZ-1: Site-Specific Spill Prevention, Control, and Countermeasure Plan	**Yes**
APM HAZ-3: Compliance with the Covenant to Restrict Use of Property	**Yes**
APM HAZ-4: Compliance with the Covenant and Agreement for Environmental Restriction	
Mitigation Measure 3.9-1a: Pre-Construction Hazardous Materials Assessment	
Mitigation Measure 3.3-2a: Construction Fleet Minimum Requirements and Tracking – Tier 4 Final Emissions Controls	**Yes**
Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions	**Yes**
APM TRA-2: Coordinate Bus Stop Closures	**Yes**
Mitigation Measure 3.17-2a: Implement Coordinated Traffic Control Plan	
Mitigation Measure 3.17-2b: Infrastructure Repair Reporting	
APM UTIL-1: Coordination with Utilities	

Biological Resources

- All workers present received WEAP training.
- No sensitive biological resources or seasonal restrictions affected today's work.
- No protected bird species, nests, or buffers were present.
- Vehicles entered the site clean and biological BMPs were implemented.
- No excavations or trenches were present that could pose wildlife hazards.
- Outdoor lighting was not in use.
- No work impacting wetlands or other jurisdictional waters occurred.
- No directional drilling or frac-out activities occurred.
- No tree removal activities occurred.

Cultural and Paleontological Resources

- Cultural team on site. ESA cultural team conducted spot check

• No paleontological resources were encountered on 5/28 at Skyline. Paleontological monitor on site.
• Work was not within State Lands jurisdiction and no submerged cultural resources were present.

Soil and Groundwater
• Vehicles and equipment remained within approved work limits.
• Construction did not occur in saturated soil conditions
• Cleared and grubbed materials were stockpiled within the active work area and covered.
• Removed vegetation remained onsite.
• Excavated materials were handled in accordance with the Soil and Groundwater Management Plan.
• No groundwater was encountered.

Hazardous Materials
• Secondary containment meeting SPCC requirements was present.
• No work occurred within restricted use or Superfund areas.

Air Quality
• All construction equipment onsite met Tier 4 fleet requirements.
• Dust control watering was observed consistent with BMPs.
• Haul trucks transporting material offsite using covers.
• No track-out was observed; street sweeping planned for later in afternoon
• Vehicles adhered to approved speed limits.
• Wind speeds remained below the 20-mph threshold.
• Construction equipment was not observed today idling longer than 5 minutes.
• CPUC dust complaint signage was observed. Permanent signage installed. Signage at all active sites observed
• Wind breaks were present along disturbed areas.
• Sandbags were used to protect storm drains and manholes.
• The site was not inactive long enough to require stabilization.
• Post-construction vegetation planting was not applicable.

Traffic and Utilities
• No bus stop closures occurred.
• Traffic control plan was implemented
• No damage to roads, sidewalks, or trails was observed.
• Utilities were marked prior to construction.

For minor problems or higher include the following:
N/A
Include corrective actions recommended.
N/A

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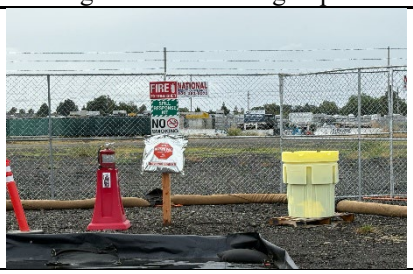
Fairgrounds – Wattling in place



Fairgrounds – fuel cell with secondary containment



Fairgrounds – spill kits in place



Fairgrounds – safety protocol for access road



Fairgrounds – Active stockpile



Fairgrounds – stockpiles with coverings



Fairgrounds – covered dumpster



Fairgrounds – covered dumpster

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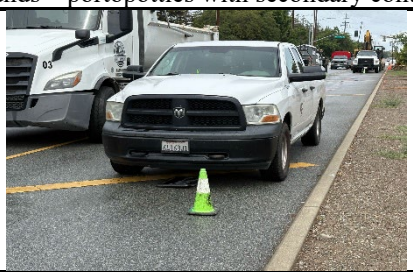
Fairgrounds – portopotties with secondary containment



Vault 8 – Trench / hole covering in place



Vault 8 – Drip pans in place under truck



Vault 8 – No idling / CPUC dust control signage



Vault 8 – Secondary containment for portopotty



Vault 8 – Light generator with drip pan



Grove – inactive equipment with drip pans



Grove – Bird buffer near access gate



Grove – bird buffer near access gate



Grove – trackout pads in place.

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Grove – Stormwater drain with sandbags in place



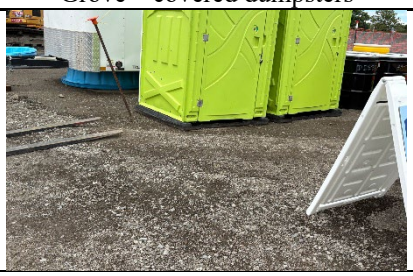
Grove – covered dumpsters



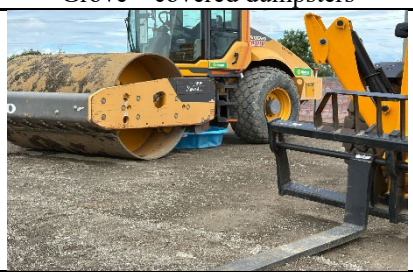
Grove – covered dumpsters



Grove – covered dumpsters



Skyline – secondary containment under portopotties



Skyline – drip pans under equipment



Skyline – drip pans under equipment



Skyline – Wattling / safety fencing in place



Skyline – Stockpiles with coverings



Skyline – covered trench

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Skyline – haul trucks with tarps in place


Skyline – street sweeping dust abatement observed

CPUC Power Santa Clara Valley
ESA Archeologist Spot Check- 5/28/2026

On Thursday 5/28/26 ESA Archeologist Eleni Carwin performed a site visit for the CPUC Power Santa Clara Valley Project. Carwin arrived at the site at Santa Teresa St.
Internal coordination with ESA Planner Stephen Doyle informed that no work was being performed at the Grove site.

Archaeologist Carwin had the goal to observe procedures and methods of the Cultural resources staff onsite and interface with the Tamien Tribal Monitors in order to ascertain whether the system in place was effective for documentation of finds.

After a site walk through with Stephen Doyle, the site safety supervisors, and foreman, Archaeologist Carwin had conversations with Tribal monitors Antonio, Easter, and Archaeologist Carina from PanGIS and a tour of the Cultural resources Conex and lock boxes.

The system of recordation includes a digital finds log, and a hard copy locked within a box inside the storage container which is only accessible to the Tribe and Cultural monitors. The container is not to be opened without a tribal representative present and all collection/documentation occurs with a tribal monitor. Finds are catalogued within the notebooks and recorded on the digital log. Carwin observed that staff seems knowledgeable and there is tremendous communication and collaboration between the tribal monitors and PanGIS archaeologist. Both parties have expressed confidence in the framework for collection and documentation as well as appreciation for the communication from the contractors and the communication received about coordination and ground disturbance activities.

In conclusion the procedure in place meets the standards for approval and the cultural artifacts documentation system is generally sufficient to meet the requirements and standards for CPUC cultural resource monitoring.

Archaeologist Carwin suggests for the future the possible implementation of additional or increased documentation for daily negative finds in order to create a complete narrative for project as a whole. This would support the current and sufficient documentation for the cultural artifacts recording already in place on site. Currently it is unclear what level of documentation there is in place for days in which no cultural materials are observed, but it would be beneficial to have a complete record.

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Power Santa Clara Valley

Compliance Monitoring Log

Date: 06/04/2026 **Time:** 09:34-11:55

Project Site:

- Skyline Terminal
  - **Activities:** Site cleanup
- Vault 14 - shoring
  - **Activities:** Duct Bank/Splice Vault Installation
- Vault 8 – crane pick / vault install
  - **Activities:** Duct Bank/Splice Vault Installation
- Grove Terminal
  - **Activities:** Inactive – Cultural / Arch protocol in place (teams processing backfill)
- Fairgrounds
  - **Activities:** Vault supplies deliveries

Compliance Level:

Acceptable ☒ Minor Corrective Action ☐ Non-Compliance ☐
Minor Problem ☐ Violation ☐

Compliance Advisory or Non-Compliance form attached Yes ☐ No ☒

Photo Documentation Yes ☒ No ☐

Type of Monitoring:

Mitigation ☒ Spot-check ☐ SWPPP inspection ☐
Biological ☐ Re-inspection ☐

General Summary of Mitigation Compliance and Site Conditions:

Describe site conditions

- Conditions: clear sky
- Wind Speed: 1.250000

Include examples of positive compliance

Measure(s)	In Compliance?
APM BIO-9: Worker Environmental Awareness (WEAP) Training Mitigation Measure 3.4-1e: Construction Worker Environmental Awareness Training Program (WEAP)	YES

APM BIO-2 Rare Plant Surveys	YES
APM BIO-7: Salt Marsh Harvest Mouse Surveys	YES
APM BIO-4: Sensitive Area Demarcation	YES
APM BIO-17: Wetland, Vernal Pool, and Waterway Construction Timing Restrictions	YES
Mitigation Measure 3.4-1a: Avoid Impacts to Rare Plants	YES
Mitigation Measure 3.4-1d: Protection of Special-Status Wildlife	YES
APM BIO-11: Special-status Bird Surveys	YES
APM BIO-5: Vehicle Cleaning Prior to Entering Natural Areas	YES
APM BIO-8: Excavation Wildlife Safety Best Management Practices	YES
APM BIO-10: Outdoor Lighting Measures	YES
Mitigation Measure 3.1-2: Minimize Fugitive Light from Temporary Sources Used for Construction	YES
Mitigation Measure 3.4-1b: Habitat Restoration and Monitoring	YES
Mitigation Measure 3.4-1c: Frac-out Plan	YES
Mitigation Measure 3.4-5: Compliance with Local Tree Ordinances	YES
APM CUL-2: Archaeological and Native American Monitoring	YES
APM CUL-4: Cultural Resources Inventory	YES
APM TCR-2: Native American Monitoring	YES
Mitigation Measure 3.5-1: Archaeological Monitoring Plan	
APM PALEO-2: Paleontological Resources Findings	YES
Mitigation Measure 3.5-2: Unanticipated Discovery of Submerged Cultural Resources	YES
APM GEO-1: Geotechnical Studies and Geologic Hazard Reduction Measures	YES
Mitigation Measure 3.9-1c: Soil and Groundwater Management Plan	YES
APM WQ-1: Groundwater Dewatering and Discharge Measures	YES
APM HAZ-1: Site-Specific Spill Prevention, Control, and Countermeasure Plan	YES
APM HAZ-3: Compliance with the Covenant to Restrict Use of Property	YES
APM HAZ-4: Compliance with the Covenant and Agreement for Environmental Restriction	YES
Mitigation Measure 3.9-1a: Pre-Construction Hazardous Materials Assessment	YES
Mitigation Measure 3.3-2a: Construction Fleet Minimum Requirements and Tracking – Tier 4 Final Emissions Controls	YES
Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions	YES
APM TRA-2: Coordinate Bus Stop Closures	YES
Mitigation Measure 3.17-2a: Implement Coordinated Traffic Control Plan	YES
Mitigation Measure 3.17-2b: Infrastructure Repair Reporting	YES
APM UTIL-1: Coordination with Utilities	
APM BIO-2 Rare Plant Surveys	YES
APM BIO-7: Salt Marsh Harvest Mouse Surveys	YES
APM BIO-4: Sensitive Area Demarcation	YES
APM BIO-17: Wetland, Vernal Pool, and Waterway Construction Timing Restrictions	YES

Mitigation Measure 3.4-1a: Avoid Impacts to Rare Plants YES
Mitigation Measure 3.4-1d: Protection of Special-Status Wildlife YES
APM BIO-11: Special-status Bird Surveys YES
APM BIO-5: Vehicle Cleaning Prior to Entering Natural Areas YES
APM BIO-8: Excavation Wildlife Safety Best Management Practices YES
APM BIO-10: Outdoor Lighting Measures YES
Mitigation Measure 3.1-2: Minimize Fugitive Light from Temporary Sources Used for Construction YES
Mitigation Measure 3.4-1b: Habitat Restoration and Monitoring YES
Mitigation Measure 3.4-1c: Frac-out Plan YES
Mitigation Measure 3.4-5: Compliance with Local Tree Ordinances YES
APM CUL-2: Archaeological and Native American Monitoring YES
APM CUL-4: Cultural Resources Inventory YES
APM TCR-2: Native American Monitoring YES
Mitigation Measure 3.5-1: Archaeological Monitoring Plan YES
APM PALEO-2: Paleontological Resources Findings YES
Mitigation Measure 3.5-2: Unanticipated Discovery of Submerged Cultural Resources YES
APM GEO-1: Geotechnical Studies and Geologic Hazard Reduction Measures YES
Mitigation Measure 3.9-1c: Soil and Groundwater Management Plan YES
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APM TRA-2: Coordinate Bus Stop Closures YES
Mitigation Measure 3.17-2a: Implement Coordinated Traffic Control Plan YES
Mitigation Measure 3.17-2b: Infrastructure Repair Reporting YES
APM UTIL-1: Coordination with Utilities YES

Biological Resources
- All workers present received WEAP training.
- No sensitive biological resources or seasonal restrictions affected today's work.
- No protected bird species, nests, or buffers were present. Bushtit nest still active at Grove.
- Vehicles entered the site clean and biological BMPs were implemented.
- No excavations or trenches were present that could pose wildlife hazards.
- Outdoor lighting was not in use.
- No work impacting wetlands or other jurisdictional waters occurred.
- No directional drilling or frac-out activities occurred.

• No tree removal activities occurred.

Cultural and Paleontological Resources
• Grove cultural / paleontological findings process in place. Arch team / Native American monitors on site.
• No paleontological resources were encountered at other sites. Paleontological and tribal monitor on site at Skyline.
• Work was not within State Lands jurisdiction and no submerged cultural resources were present.

Soil and Groundwater
• Vehicles and equipment remained within approved work limits.
• Construction did not occur in saturated soil conditions
• Cleared and grubbed materials were stockpiled within the active work area and covered.
• Removed vegetation remained onsite.
• Excavated materials were handled in accordance with the Soil and Groundwater Management Plan.
• No groundwater was encountered.

Hazardous Materials
• Secondary containment meeting SPCC requirements was present.
• No work occurred within restricted use or Superfund areas.

Air Quality
• All construction equipment onsite met Tier 4 fleet requirements.
• Dust control watering was observed consistent with BMPs.
• Haul trucks transporting material offsite using covers.
• No track-out was observed; street sweeping planned for later in afternoon
• Vehicles adhered to approved speed limits.
• Wind speeds remained below the 20-mph threshold.
• Construction equipment was not observed today idling longer than 5 minutes.
• CPUC dust complaint signage was observed. Permanent signage installed. Signage at all active sites observed
• Wind breaks were present along disturbed areas.
• Sandbags were used to protect storm drains and manholes.
• The site was not inactive long enough to require stabilization.
• Post-construction vegetation planting was not applicable.

Traffic and Utilities
• No bus stop closures occurred.
• Traffic control plan was implemented
• No damage to roads, sidewalks, or trails was observed.
• Utilities were marked prior to construction.

For minor problems or higher include the following:
N/A
Include corrective actions recommended.
N/A

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Fairgrounds – Perimeter fencing / wattling in place



Fairgrounds – Fuel cell with secondary containment



Fairgrounds – spill kit / liner in place for future fuel cells



Fairgrounds – drip pans in place for excavator



Fairgrounds – covered dumpster



Fairgrounds – portopotty secondary containment



Fairgrounds – backfill / materials covered



Fairgrounds – baker tank with secondary containment



Fairgrounds - hazmat locker with secondary containment



Fairgrounds – dust abatement / water truck observed



Grove – Water truck / dust abatement observed



Grove – trackout pads in place / no trackout observed



Grove – fuel cell with secondary containment



Grove – wattling in place



Grove – drip pans under inactive equipment



Vault 8 – Generator with drip pan



Vault 8 – drip pan under equipment



Grove – Backfill pile with flags for cultural / arch



Vault 8 – drip pan under crane truck



Grove – Generator with liner in place

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Grove – Backfill ready for cultural processing



Vault 8 – no idling / CPUC dust control signage



Vault 14 – no idling / CPUC dust control signage



Vault 8 – trench coverings observed



Vault 8 – drip pans in place



Grove – spill kit in place



Vault 8 – portopotty secondary containment in place



Vault 8 – drip pan under truck observed

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Grove – Drip pan under excavator



Vault 8 – stormwater drain cover / sand bags in place



Grove – finches observed in metal PGE barn



Vault 8 – generator in place



Vault 14 – Portopotty with secondary containment



Skyline – check in table for haul trucks



Vault 14 – generator with drip pan observed



Vault 14 – drip pans in place



Skyline – locked arch / cultural storage container



Skyline – secured debris corner of site

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Skyline – trench covering in place



Skyline – fuel cell with secondary containment



Skyline – wattling in place



Skyline – generator with secondary containment



Skyline – water truck / dust abatement observed



Skyline – covered dumpster

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Power Santa Clara Valley

Compliance Monitoring Log

Date: 6/10/2026 **Time:** 11:30PM-2:30PM

Report Code: PSCV20260512_AJH

Project Site: Grove Terminal, Santa Clara Fairgrounds, and Skyline Terminal

Compliance Level:

Acceptable ☒ Minor Corrective Action ☐ Non-Compliance ☐
Minor Problem ☐ Violation ☐

Compliance Advisory or Non-Compliance form attached Yes ☐ No ☒

Photo Documentation Yes ☒ No ☐

Type of Monitoring:

Mitigation ☒ Spot-check ☐ SWPPP inspection ☐
Biological ☐ Re-inspection ☐

Construction Activity(s) Being Monitored:

- Removing dirt from stockpiles and excavating at Skyline.
- Deliveries and site maintenance conducted at Santa Clara Fairgrounds.
- Pulling shoring out of trench at Vault 10 and 14.
- Placing shoring into trench with native American and archaeological monitor present at Vault 12.
- Placing gravel over trench and compacting at Vault 4.
- Excavating southwest biological retention pond at Grove Terminal.

General Summary of Mitigation Compliance and Site Conditions:

Describe site conditions

- Clear and sunny skies. Light wind at Skyline, Grove terminals, and Santa Clara Fairgrounds.

Biological Resources

• All workers present received WEAP training.
• No sensitive biological resources or seasonal restrictions affected today's work.
• No protected bird species, nests, or buffers were present.
• Vehicles entered the site clean and biological BMPs were implemented.
• No excavations or trenches were present that could pose wildlife hazards.
• Outdoor lighting was not in use.

• No work impacting wetlands or other jurisdictional waters occurred.
• No directional drilling or frac-out activities occurred.
• Tree removal occurred at Grove terminals with AECOM biologist present.

Cultural and Paleontological Resources
• No cultural resources issues were identified; **monitoring was required at Vault 12**.
• No paleontological resources were encountered.
• Work was not within State Lands jurisdiction, and no submerged cultural resources were present.

Soil and Groundwater
• Vehicles and equipment remained within approved work limits.
• Construction did not occur in saturated soil conditions (topsoil was wet).
• Cleared and grubbed materials were stockpiled within the active work area and covered.
• Removed vegetation remained onsite.
• Excavated materials were handled in accordance with the Soil and Groundwater Management Plan.
• No groundwater was encountered.

Hazardous Materials
• Secondary containment meeting SPCC requirements was present.
• No work occurred within restricted use or Superfund areas.

Air Quality
• All construction equipment onsite met Tier 4 fleet requirements.
• Dust control watering was observed consistent with BMPs.
• No haul trucks transported material offsite.
• No track-out was observed; prior street sweeping was noted.
• Vehicles adhered to approved speed limits.
• Wind speeds remained below the 20-mph threshold.
• Construction equipment idled less than 5 minutes.
• CPUC dust complaint signage was observed.
• Wind breaks were present along disturbed areas.
• Sandbags were used to protect storm drains and manholes.
• The site was not inactive long enough to require stabilization.
• Post-construction vegetation planting was not applicable.

Traffic and Utilities
• No bus stop closures occurred.
• No traffic control plan was implemented; nearby dealership test driving was noted as a concern.
• No damage to roads, sidewalks, or trails was observed.
• Utilities were marked prior to construction.

Include corrective actions recommended.
N/A

For minor problems or higher include the following:
• Concern about high-speed traffic from nearby dealerships

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Removing soil and excavating at Skyline Terminal site.

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Multiple deliveries conducted at Santa Clara Fairgrounds.

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Pulling shoring out of trench at Vault 14.

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Placing shoring into trench at Vault 12.

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Gravel placement and compaction at Vault 4.

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Excavating the southwest biological retention pond at Grove Terminals.

Alicia J Herbert, 6/10/2026
ESA Monitor

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Power Santa Clara Valley

Compliance Monitoring Log

Date: 06/18/2026 **Time:** 11:37-15:58

Project Site:

- Skyline
  - **Activities:** Trenching / backfilling
- Vault 10
  - **Activities:** Concrete pouring
- Vault 14
  - **Activities:** Paving
- Fairgrounds
  - **Activities:** Staging yard deliveries
- Grove
  - **Activities:** Trenching / backfilling

Compliance Level:

Acceptable ☒ Minor Corrective Action ☐ Non-Compliance ☐
Minor Problem ☐ Violation ☐

Compliance Advisory or Non-Compliance form attached Yes ☐ No ☒

Photo Documentation Yes ☒ No ☐

Type of Monitoring:

Mitigation ☒ Spot-check ☐ SWPPP inspection ☐
Biological ☐ Re-inspection ☐

General Summary of Mitigation Compliance and Site Conditions:

Describe site conditions

- Conditions: clear sky
- Wind Speed: 5.360000

Include examples of positive compliance

Measure(s)	In Compliance?
APM BIO-9: Worker Environmental Awareness (WEAP) Training	**Yes**
Mitigation Measure 3.4-1e: Construction Worker Environmental Awareness Training Program (WEAP)	
APM BIO-2 Rare Plant Surveys	**Yes**
APM BIO-7: Salt Marsh Harvest Mouse Surveys	
APM BIO-4: Sensitive Area Demarcation	

APM BIO-17: Wetland, Vernal Pool, and Waterway Construction Timing Restrictions	
Mitigation Measure 3.4-1a: Avoid Impacts to Rare Plants	
Mitigation Measure 3.4-1d: Protection of Special-Status Wildlife	
APM BIO-11: Special-status Bird Surveys	**Yes**
APM BIO-5: Vehicle Cleaning Prior to Entering Natural Areas	**Yes**
APM BIO-8: Excavation Wildlife Safety Best Management Practices	**Yes**
APM BIO-10: Outdoor Lighting Measures	**Yes**
Mitigation Measure 3.1-2: Minimize Fugitive Light from Temporary Sources Used for Construction	
Mitigation Measure 3.4-1b: Habitat Restoration and Monitoring	**Yes**
Mitigation Measure 3.4-1c: Frac-out Plan	**Yes**
Mitigation Measure 3.4-5: Compliance with Local Tree Ordinances	**Yes**
APM CUL-2: Archaeological and Native American Monitoring	**Yes**
APM CUL-4: Cultural Resources Inventory	
APM TCR-2: Native American Monitoring	
Mitigation Measure 3.5-1: Archaeological Monitoring Plan	
APM PALEO-2: Paleontological Resources Findings	**Yes**
Mitigation Measure 3.5-2: Unanticipated Discovery of Submerged Cultural Resources	**Yes**
APM GEO-1: Geotechnical Studies and Geologic Hazard Reduction Measures	**Yes**
Mitigation Measure 3.9-1c: Soil and Groundwater Management Plan	
APM WQ-1: Groundwater Dewatering and Discharge Measures	
APM HAZ-1: Site-Specific Spill Prevention, Control, and Countermeasure Plan	**Yes**
APM HAZ-3: Compliance with the Covenant to Restrict Use of Property	**Yes**
APM HAZ-4: Compliance with the Covenant and Agreement for Environmental Restriction	
Mitigation Measure 3.9-1a: Pre-Construction Hazardous Materials Assessment	
Mitigation Measure 3.3-2a: Construction Fleet Minimum Requirements and Tracking – Tier 4 Final Emissions Controls	**Yes**
Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions	**Yes**
APM TRA-2: Coordinate Bus Stop Closures	**Yes**
Mitigation Measure 3.17-2a: Implement Coordinated Traffic Control Plan	
Mitigation Measure 3.17-2b: Infrastructure Repair Reporting	
APM UTIL-1: Coordination with Utilities	
APM BIO-2 Rare Plant Surveys	**Yes**
APM BIO-7: Salt Marsh Harvest Mouse Surveys	
APM BIO-4: Sensitive Area Demarcation	
APM BIO-17: Wetland, Vernal Pool, and Waterway Construction Timing Restrictions	
Mitigation Measure 3.4-1a: Avoid Impacts to Rare Plants	
Mitigation Measure 3.4-1d: Protection of Special-Status Wildlife	
APM BIO-11: Special-status Bird Surveys	**Yes**
APM BIO-5: Vehicle Cleaning Prior to Entering Natural Areas	**Yes**

APM BIO-8: Excavation Wildlife Safety Best Management Practices	**Yes**
APM BIO-10: Outdoor Lighting Measures	**Yes**
Mitigation Measure 3.1-2: Minimize Fugitive Light from Temporary Sources Used for Construction	
Mitigation Measure 3.4-1b: Habitat Restoration and Monitoring	**Yes**
Mitigation Measure 3.4-1c: Frac-out Plan	**Yes**
Mitigation Measure 3.4-5: Compliance with Local Tree Ordinances	**Yes**
APM CUL-2: Archaeological and Native American Monitoring	**Yes**
APM CUL-4: Cultural Resources Inventory	
APM TCR-2: Native American Monitoring	
Mitigation Measure 3.5-1: Archaeological Monitoring Plan	
APM PALEO-2: Paleontological Resources Findings	**Yes**
Mitigation Measure 3.5-2: Unanticipated Discovery of Submerged Cultural Resources	**Yes**
APM GEO-1: Geotechnical Studies and Geologic Hazard Reduction Measures	**Yes**
Mitigation Measure 3.9-1c: Soil and Groundwater Management Plan	
APM WQ-1: Groundwater Dewatering and Discharge Measures	
APM HAZ-1: Site-Specific Spill Prevention, Control, and Countermeasure Plan	**Yes**
APM HAZ-3: Compliance with the Covenant to Restrict Use of Property	**Yes**
APM HAZ-4: Compliance with the Covenant and Agreement for Environmental Restriction	
Mitigation Measure 3.9-1a: Pre-Construction Hazardous Materials Assessment	
Mitigation Measure 3.3-2a: Construction Fleet Minimum Requirements and Tracking – Tier 4 Final Emissions Controls	**Yes**
Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions	**Yes**
APM TRA-2: Coordinate Bus Stop Closures	**Yes**
Mitigation Measure 3.17-2a: Implement Coordinated Traffic Control Plan	
Mitigation Measure 3.17-2b: Infrastructure Repair Reporting	
APM UTIL-1: Coordination with Utilities	

Biological Resources

- All workers present received WEAP training.
- No sensitive biological resources or seasonal restrictions affected today's work.
- No protected nests, or buffers were present.
- **Golden eagle observed at Skyline sitting on spoils pile – doesn't appear to be nesting**
- Vehicles entered the site clean and biological BMPs were implemented.
- No excavations or trenches were present that could pose wildlife hazards.
- Outdoor lighting was not in use.
- No work impacting wetlands or other jurisdictional waters occurred.
- No directional drilling or frac-out activities occurred.
- No tree removal activities occurred.

Cultural and Paleontological Resources

• No cultural resources issues were identified; no monitoring was required.
• No paleontological resources were encountered. Paleontological monitor on site.
• Work was not within State Lands jurisdiction and no submerged cultural resources were present.

Soil and Groundwater
• Vehicles and equipment remained within approved work limits.
• Construction did not occur in saturated soil conditions
• Cleared and grubbed materials were stockpiled within the active work area and covered.
• Removed vegetation remained onsite.
• Excavated materials were handled in accordance with the Soil and Groundwater Management Plan.
• No groundwater was encountered.

Hazardous Materials
• Secondary containment meeting SPCC requirements was present.
• No work occurred within restricted use or Superfund areas.

Air Quality
• All construction equipment onsite met Tier 4 fleet requirements.
• Dust control watering was observed consistent with BMPs.
• Haul trucks transporting material offsite using covers.
• No track-out was observed; street sweeping planned for later in afternoon
• Vehicles adhered to approved speed limits.
• Wind speeds remained below the 20-mph threshold.
• Construction equipment was not observed today idling longer than 5 minutes.
• CPUC dust complaint signage was observed. Permanent signage installed. Signage at all active sites observed
• Wind breaks were present along disturbed areas.
• Sandbags were used to protect storm drains and manholes.
• The site was not inactive long enough to require stabilization.
• Post-construction vegetation planting was not applicable.

Traffic and Utilities
• No bus stop closures occurred.
• Traffic control plan was implemented
• No damage to roads, sidewalks, or trails was observed.
• Utilities were marked prior to construction.

For minor problems or higher include the following:
N/A
Include corrective actions recommended.
N/A

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Skyline – spoils piles



Skyline – dust control watering



Skyline – covered dumpster



Skyline – trenching with arch / tribal monitors present



Skyline – Water truck / dust control



Skyline – trenching with arch / tribal monitors present



Skyline – perimeter fence / wattling in good condition



Skyline – golden eagle observed

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Skyline – drip pans in place for equipment



Skyline – wattling in place



Skyline – wattling in place



Skyline – vault opening / hole covered.



Grove – Stockpiles covered



Vault 10 – paving work



Vault 10 – drip pans in place



Vault 10 – drip pans under light generator



Vault 10 – CPUC dust complaint / no idling signage



Vault 10 – drip pans in place

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Vault 10 – paving work


Vault 14 – drip pans in place


Vault 14 – drip pans under light generator


Skyline – trackout pads / no trackout observed


Fairgrounds – fuel cell with secondary containment


Fairgrounds – spill kit (preferred yellow kit)



Fairgrounds – spill kit


Fairgrounds – drip pan in place


Vault 14 – stormwater drain BMP



Fairgrounds – water truck observed

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Vault 14 – liner under porto potty



Skyline – street sweeper observed



Vault 10 – drip pans under light generator



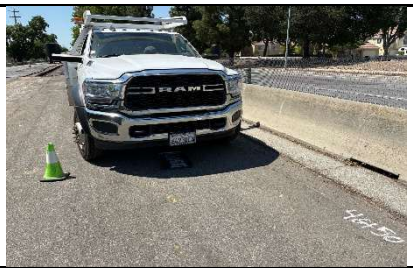
Vault 14 – concrete work



Vault 14 – concrete work



Vault 14 – CPUC dust complaint / no idling signage



Vault 10 – drip pans in place



Vault 10 – liner under porto potty

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Grove – wattling in place



Vault 10 – trench work



Vault 14 – CPUC dust complaint / no idling signage



Grove – grubbing work on perimeter fence



Grove – trackout pads / no trackout observed



Grove – water truck / dust abatement

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Power Santa Clara Valley

Compliance Monitoring Log

Date: 6/23/2026 **Time:** 8:00AM-11:00AM

Report Code: PSCV202600623_AJH

Project Site: Grove Terminal, Santa Clara Fairgrounds, and Skyline Terminal

Compliance Level:

Acceptable ☒ Minor Corrective Action ☐ Non-Compliance ☐
Minor Problem ☐ Violation ☐

Compliance Advisory or Non-Compliance form attached Yes ☐ No ☒

Photo Documentation Yes ☒ No ☐

Type of Monitoring:

Mitigation ☒ Spot-check ☐ SWPPP inspection ☐
Biological ☐ Re-inspection ☐

Construction Activity(s) Being Monitored:

- Removing dirt from stockpiles and excavating at Skyline.
- Deliveries and site maintenance conducted at Santa Clara Fairgrounds.
- Installing vault at Vault 15.
- Saw cutting and demolition at Vault 13, as well as surveying road for trenching to dig 4ft.
- Conduit installation into trench at Segment 5 between Vault 4 and 5.
- Hauling dirt off-site at Grove.

General Summary of Mitigation Compliance and Site Conditions:

Describe site conditions

- Cloudy skies in the early morning and clear skies in the late morning. Light wind at Skyline, Grove terminals, and Santa Clara Fairgrounds.

Biological Resources

• All workers present received WEAP training.
• No sensitive biological resources or seasonal restrictions affected today's work.
• No protected bird species, nests, or buffers were present. **Multiple cliff swallow nests observed under the highway underpass at Skyline Terminal. Although hauling and excavating was conducted nearby the nests, the swallows appeared undisturbed. No buffer was required as work was conducted more than 20ft away from the nests.**
• Vehicles entered the site clean and biological BMPs were implemented.

• No excavations or trenches were present that could pose wildlife hazards.
• Outdoor lighting was not in use.
• No work impacting wetlands or other jurisdictional waters occurred.
• No directional drilling or frac-out activities occurred.

Cultural and Paleontological Resources
• No cultural resources issues were identified; **monitoring was required at Skyline and Grove terminal**.
• No paleontological resources were encountered.
• Work was not within State Lands jurisdiction, and no submerged cultural resources were present.

Soil and Groundwater
• Vehicles and equipment remained within approved work limits.
• Construction did not occur in saturated soil conditions (topsoil was wet).
• Cleared and grubbed materials were stockpiled within the active work area and covered.
• Removed vegetation remained onsite.
• Excavated materials were handled in accordance with the Soil and Groundwater Management Plan.
• No groundwater was encountered.

Hazardous Materials
• Secondary containment meeting SPCC requirements was present.
• No work occurred within restricted use or Superfund areas.

Air Quality
• All construction equipment onsite met Tier 4 fleet requirements.
• Dust control watering was observed consistent with BMPs.
• No haul trucks transported material offsite. **Haul trucks on-site to remove soil at Skyline and Grove were covered properly to minimize dust.**
• No track-out was observed; prior street sweeping was noted.
• Vehicles adhered to approved speed limits.
• Wind speeds remained below the 20-mph threshold.
• Construction equipment idled less than 5 minutes.
• CPUC dust complaint signage was observed.
• Wind breaks were present along disturbed areas.
• Sandbags were used to protect storm drains and manholes.
• The site was not inactive long enough to require stabilization.
• Post-construction vegetation planting was not applicable.

Traffic and Utilities
• No bus stop closures occurred.
• No traffic control plan was implemented; nearby dealership test driving was noted as a concern.
• No damage to roads, sidewalks, or trails was observed.
• Utilities were marked prior to construction.

Include corrective actions recommended.

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N/A

For minor problems or higher include the following:

- Concern about high-speed traffic from nearby dealerships



Removing soil and excavating at Skyline Terminal site.

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Multiple deliveries conducted at Santa Clara Fairgrounds.

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Installing vault at Vault 15.

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Surveying for trench at Vault 13.

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Saw cutting at Vault 8.

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Conduit installment at Segment 5.

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Hauling soil off-site at Grove.

Alicia J Herbert and Eleni Carwin, 6/23/2026

ESA Monitors

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Power Santa Clara Valley

Compliance Monitoring Log

Date: 6/30/2026 **Time:** 8:00AM-11:00AM

Report Code: PSCV202600630_AJH

Project Site: Grove Terminal, Santa Clara Fairgrounds, and Skyline Terminal

Compliance Level:

Acceptable ☒ Minor Corrective Action ☐ Non-Compliance ☐
Minor Problem ☐ Violation ☐

Compliance Advisory or Non-Compliance form attached Yes ☐ No ☒

Photo Documentation Yes ☒ No ☐

Type of Monitoring:

Mitigation ☒ Spot-check ☐ SWPPP inspection ☐
Biological ☐ Re-inspection ☐

Construction Activity(s) Being Monitored:

- Exporting soil off-site, importing gravel and compaction activities are planned for a future date at Skyline.
- Deliveries and site maintenance conducted at Santa Clara Fairgrounds.
- Pouring concrete slurry, placement of manhole covers, pulling shoring out of trench, and future plans of pavement at Vault 13.
- Vault placement and site maintenance at Vault 11.
- Conduit installation into trench, vault placement, and trenching at Segment 8.
- Pouring concrete slurry, trenching, and demolition of asphalt at Segment 5.
- Screening and filtering soil for large rocks on the southeastern end of site in preparation for compaction at Grove.

General Summary of Mitigation Compliance and Site Conditions:

Describe site conditions

- Clear sunny skies with moderate wind at Skyline, Grove terminals, and Santa Clara Fairgrounds.

Biological Resources

• All workers present received WEAP training.
• No sensitive biological resources or seasonal restrictions affected today's work.

• No protected bird species, nests, or buffers were present. **Multiple cliff swallow nests observed under the highway underpass at Skyline Terminal. Although hauling was conducted nearby the nests, the swallows appeared undisturbed. No buffer was required as work was conducted more than 20ft away from the nests. No other nest starts or nesting behavior was observed.**
• Vehicles entered the site clean and biological BMPs were implemented.
• No excavations or trenches were present that could pose wildlife hazards.
• Outdoor lighting was not in use.
• No work impacting wetlands or other jurisdictional waters occurred.
• No directional drilling or frac-out activities occurred.

Cultural and Paleontological Resources
• No cultural resources issues were identified; **monitoring was required at Grove terminal**.
• No paleontological resources were encountered.
• Work was not within State Lands jurisdiction, and no submerged cultural resources were present.

Soil and Groundwater
• Vehicles and equipment remained within approved work limits.
• Construction did not occur in saturated soil conditions (topsoil was wet).
• Cleared and grubbed materials were stockpiled within the active work area and covered.
• Removed vegetation remained onsite.
• Excavated materials were handled in accordance with the Soil and Groundwater Management Plan.
• No groundwater was encountered.

Hazardous Materials
• Secondary containment meeting SPCC requirements was present.
• No work occurred within restricted use or Superfund areas.

Air Quality
• All construction equipment onsite met Tier 4 fleet requirements.
• Dust control watering was observed to be consistent with BMPs.
• No haul trucks transported material offsite. **Haul trucks on-site to remove soil at Skyline and were covered properly to minimize dust.**
• No track-out was observed; prior street sweeping was noted.
• Vehicles adhered to approved speed limits.
• Wind speeds remained below the 20-mph threshold.
• Construction equipment idled less than 5 minutes.
• CPUC dust complaint signage was observed.
• Wind breaks were present along disturbed areas.
• Sandbags were used to protect storm drains and manholes.
• The site was not inactive long enough to require stabilization.
• Post-construction vegetation planting was not applicable.

Traffic and Utilities
• No bus stop closures occurred.

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• No traffic control plan was implemented; nearby dealership test driving was noted as a concern.
• No damage to roads, sidewalks, or trails was observed.
• Utilities were marked prior to construction.

Include corrective actions recommended.
N/A

For minor problems or higher include the following:
• Concern about high-speed traffic from nearby dealerships



Importing gravel at Skyline Terminal site.

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Multiple deliveries conducted at Santa Clara Fairgrounds.

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Manhole cover placement at Vault 13.

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Site maintenance at Vault 11.

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Conduit installment at Segment 8.

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Pouring concrete slurry at Segment 5.

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Screening soil at Grove.

Alicia J Herbert and Eleni Carwin, 6/30/2026

ESA Monitors

Appendix C
Construction MMCRP

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

CONSTRUCTION MITIGATION MONITORING, COMPLIANCE, AND REPORTING PROGRAM

LS Power Grid California, LLC – Power Santa Clara Valley Project

(APPLICATION NO. A.24-04-017)

1 Introduction

This document is an expanded version of the mitigation monitoring, compliance, and reporting program (MMCRP), which ensures the effective implementation of the mitigation measures required for the California Public Utilities Commission (CPUC) approval of the LS Power Grid California, LLC (LSPGC) application to construct, operate, and maintain the Power Santa Clara Valley Project (Project). The CPUC, as lead agency under the California Environmental Quality Act (CEQA), prepared and considered the Final Environmental Impact Report (Final EIR) for the Power Santa Clara Valley Project, including analysis of the proposed Project and alternatives. The "project" selected for approval is Alternative Combination 1 (AC-1) (Approved Project),[1] which the Final EIR identified as the environmentally superior alternative that meets the project objectives.

This Construction MMCRP includes all measures proposed by LSPGC, referred to as Applicant Proposed Measures (APMs), and all mitigation measures identified by the CPUC that LSPGC is required to implement to reduce potentially significant impacts. Additionally, since the Project includes interconnection with existing substations owned and operated by Pacific Gas and Electric Company (PG&E), this Construction MMCRP includes all the best management practices (BMPs) and field protocols (FPs) that PG&E has committed to implementing, and all mitigation measures identified by the CPUC that PG&E is required to implement for any activities subject to prior approval by CPUC under General Order 131-E to reduce potentially significant impacts associated with the PG&E portions of the Approved Project at the existing PG&E Metcalf and PG&E San Jose B substations. All APMs, BMPs, FPs, and mitigation measures applicable to the Project are presented in **Appendix A** provided at the end of this Construction MMCRP.

[1] References to the Approved Project in this document are synonymous with AC-1. The Project as initially proposed is not the project being carried forward for consideration, but rather the alternative combination designated as AC-1.

On March 19th, 2026, the CPUC approved the Project, configured as AC-1 (Approved Project), and granted LSPGC a certificate of public convenience and necessity (CPCN)[2] and certified the CPUC's Final EIR for the Project, including the mitigation measures outlined in this document. Following Project approval, this Construction MMCRP serves as a self-contained general reference for the Project approved by the CPUC to ensure that all measures are implemented as adopted. This Construction MMCRP builds on the Final EIR's MMCRP (Final EIR Appendix G) to include more detailed information regarding implementation of mitigation and other measures during construction, including identifying responsible parties, the responsibilities of each party, and procedures for minor project refinements, compliance reporting, dispute resolution, and construction schedule and communication protocols.

Under the original proposed project, PG&E was planning construction activities that would occur outside of the fenceline of its existing Metcalf Substation. Therefore, specific mitigation measures were required to be implemented by PG&E for the proposed project in addition to PG&E's BMPs and FPs. However, under the Approved Project, PG&E is no longer required to implement construction activities outside of the Metcalf Substation fenceline. PG&E's activities at its San Jose B Substation are also authorized under Advice Letter 7391-E. Therefore, no additional approvals and authorizations from CPUC are required by PG&E to complete its portion of the Approved Project. As a result, PG&E Mitigation Measures required in the EIR would no longer be required, unless any project changes during construction result in PG&E activities outside of the substations warranting additional CPUC approvals. Therefore, PG&E's mitigation measures are retained here in this MMCRP for tracking purposes in the event there are project changes during construction. PG&E has also committed to implement its BMPs and FPs during construction which are documented in this MMCRP which will be tracked by CPUC.

1.1 California Public Utilities Commission - MMCRP Authority

The California Public Utilities Code in numerous places confers authority upon the CPUC to regulate the terms of service and safety practices and equipment of utilities subject to its jurisdiction. It is the standard practice of the CPUC, pursuant to its statutory responsibility to protect the environment, to require that mitigation measures stipulated as conditions of approval for the Project are implemented properly, monitored, and reported on. In 1989, this requirement was codified statewide as Section 21081.6 of the Public Resources Code. Section 21081.6 requires a public agency to adopt a reporting or monitoring program when it adopts an environmental impact report for a project that could have potentially significant environmental effects. California Environmental Quality Act (CEQA) Guidelines Section 15097 was added in 1999 to further clarify agency requirements for mitigation monitoring and reporting.

The purpose of this Construction MMCRP is to ensure that measures adopted to mitigate or avoid significant impacts described in the EIR are implemented. The CPUC views this Construction MMCRP as a working guide to facilitate not only the implementation of mitigation measures by

[2] CPUC Decision 26-03-042, March 19th, 2026 granting LS Power Grid California, LLC a Certificate of Public Convenience and Necessity for the Power Santa Clara Valley Project. Date of Issuance for Decision: March 19th, 2026.

LSPGC and PG&E, but also to document the monitoring, compliance, and reporting activities of the CPUC and any monitors it may designate.

This Construction MMCRP clarifies mitigation monitoring and reporting requirements prescribed by the CPUC as part of the CEQA record into one document, and outlines key actions and strategies that LSPGC and PG&E will undertake to achieve their obligations relating to monitoring and reporting compliance with the adopted environmental commitments (i.e., mitigation measures and APMs for LSPGC, and BMPs and FPs for PG&E) for the Project, as identified in Volume II, Appendix G of the Final EIR and provided in this document as Appendix A.

1.2 Project Location and Overview

The "project" selected for approval is Alternative Combination 1 (AC-1), which is the environmentally superior alternative identified in the EIR that meets the project objectives. Therefore, this Construction MMCRP focuses strictly on implementation of AC-1. AC-1, herein defined as the 'Approved Project', is located within the city of San José and unincorporated Santa Clara County. The Approved Project will connect PG&E's San Jose B Substation in the north with PG&E's Metcalf Substation in the south.

The Approved Project includes components that would be constructed and operated by LSPGC. These components consist of two new high-voltage direct current (HVDC) terminals, an approximately 11.8-mile underground transmission line connecting the new HVDC terminals and an approximately 100-foot overhead transmission tie line to connect one of the new HVDC terminals to the existing PG&E San Jose B Substation, pursuant to CPUC General Order 131-D.[3] Since the Approved Project's Grove HVDC Terminal site (identified as the Grove Terminal Alternative 3 site in the Final EIR) is directly adjacent to the PG&E Metcalf Substation modification area, the overhead Metcalf to Grove 500 kV transmission tie line from the LSPGC dead-end structure within the terminal site to a PG&E-owned dead-end structure inside the proposed PG&E Metcalf Substation modification area will only be approximately 200 feet long. Connection to the PG&E Metcalf and PG&E San Jose B substations will require PG&E to modify the existing PG&E Metcalf Substation and expand and upgrade the existing PG&E San Jose B Substation. The Project's components are as follows:

- Skyline HVDC Terminal
- Grove HVDC Terminal
- Grove to Skyline 320-kilovolt (kV) Direct Current (DC) Transmission Line
- Metcalf to Grove 500 kV Alternating Current (AC) Transmission Tie Line
- Skyline to San Jose B 230 kV AC Transmission Tie Line

[3] LSPGC's application for a CPCN was initially filed and deemed complete in June 2024 when General Order (GO) 131-D was in effect; therefore, LSPGC's portion of the Power Santa Clara Valley Project has been permitted under GO 131-D. All filings after January 30, 2025, are subject to GO 131-E requirements; therefore, PG&E's portion of the Project is permitted under GO 131-E. Because LSPGC's CPCN application includes components within and adjacent to PG&E property, PG&E became a Party of the CPUC's Proceeding for LSPGC's CPCN application, following Rule 1.4 from CPUC's Rules of Practice and Procedure.

- Modifications to the existing PG&E Metcalf Substation
- Expansion of and modifications at the existing PG&E San Jose B Substation

The Approved Project includes LSPGC's Power Santa Clara Valley Project. The modifications to the PG&E substations, though included in the PEA filed with LSPGC's application, are not part of the work submitted for authorization in LSPGC's application as PG&E is not an applicant of this proceeding.

The CPUC review concluded that implementation of AC-1 (referred to as the Approved Project in this Construction MMCRP) would result in significant and unavoidable impacts to cultural resources and tribal cultural resources. These impacts are related to the construction of LSPGC Project components involving excavation potentially within and in the vicinity of archaeological resources and/or human remains. All other impacts would be mitigated to less-than-significant levels or would be less than significant without the need for mitigation measures. LSPGC is required to incorporate all the CPUC-recommended mitigation measures into the Approved Project. Likewise, PG&E has committed to implementing all mitigation measures, BMPs, and FPs applicable to the portions of the Approved Project for which it is responsible. The CPUC Energy Division circulated the EIR for public review. In the decision approving AC-1, the CPUC certified the Final EIR and adopted the MMCRP enclosed therein as Appendix G, which specifies the required LSPGC and PG&E mitigation measures, LSPGC APMs, PG&E BMPs, and PG&E FPs.

The Final EIR presented and analyzed potential environmental impacts that would result from construction, operation, and maintenance of the Approved Project, and recommended mitigation measures as appropriate. Based on the EIR, approval of the application would have no impact or less-than-significant impacts in the following areas for AC-1:

- Agriculture and Forestry Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Recreation
- Wildfire

The Final EIR indicated that approval of the application would result in potentially significant impacts in the areas listed below for AC-1, and so identified adopted APMs, PG&E BMPS and FPs, and CPUC-recommended mitigation measures that have been accepted by LSPGC and PG&E to reduce the significance below established thresholds.

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Noise
- Public Services
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

Further, the Final EIR indicates that approval of the application could result in potentially significant and unavoidable impacts for AC-1 in the areas listed below:

- Cultural Resources
- Tribal Cultural Resources

It should be noted that certain cultural resources and tribal cultural resources impacts (at the Project-level and cumulatively) attributable to the construction of AC-1 components involving excavation potentially within and in the vicinity of archaeological resources and/or human remains could not be reduced below significance thresholds even with the implementation of mitigation measures, as there is high potential for unrecorded subsurface archaeological remains. This is explained in detail in Final EIR Volume I, Section 3.5, *Cultural Resources*, Section 3.18, *Tribal Cultural Resources*, Section 4.9, *Environmentally Superior Alternative*, and Section 5.2, *Significant Unavoidable Environmental Effects*.

2 Roles and Responsibilities

As the lead agency under CEQA, the CPUC is required to monitor the Approved Project to ensure that the required mitigation measures and all APMs, BMPs, and FPs are implemented, as described in the Final EIR. The CPUC is responsible for ensuring full compliance with the provisions of this Construction MMCRP and has primary responsibility for implementation of the monitoring program. The purpose of the monitoring program is to ensure that measures adopted to mitigate or avoid significant impacts of a project are implemented. The CPUC has the authority to halt any activity associated with the Approved Project if the activity is determined to be a deviation from the Approved Project or the adopted APMs, BMPs, FPs, or mitigation measures. PG&E will be responsible for reporting compliance with its own BMPs and FPs to the CPUC.

Although the CPUC has granted LSPGC a CPCN to construct and operate the Project, LSPGC remains responsible for implementation of the LSPGC mitigation measures and APMs governing the construction and future operation of the Approved Project. Though other State and local agencies have permit and approval authority over some aspects of the Approved Project, the CPUC acts as the lead agency for monitoring compliance with all mitigation measures, APMs, BMPs, and FPs identified in the Final EIR and required by the CPUC's decision. All other agency approvals and permits obtained by LSPGC will be submitted to the CPUC for compliance verification and recordkeeping prior to commencing the activity for which the permits and approvals were obtained.

Consistent with CEQA Guidelines section 15097(a), the CPUC may delegate duties and responsibilities for monitoring to other mitigation monitors or consultants as deemed necessary. The CPUC will ensure that the person(s) delegated any duties or responsibilities are qualified to monitor compliance.

The CPUC, along with its mitigation monitor, will ensure that the minor project refinement process follows procedures and requirements outlined in the decision and Section 4 of this MMCRP, and any deviation from the procedures identified under the monitoring program, is consistent with CEQA requirements. The CPUC may approve requests by LSPGC for minor project refinements that may be necessary due to the final engineering of the Approved Project,

change in existing site conditions, local permit conditions, or to facilitate safe and efficient construction. The CPUC may approve such requests so long as such minor project refinements are located within the geographic boundary of the study area of the EIR.

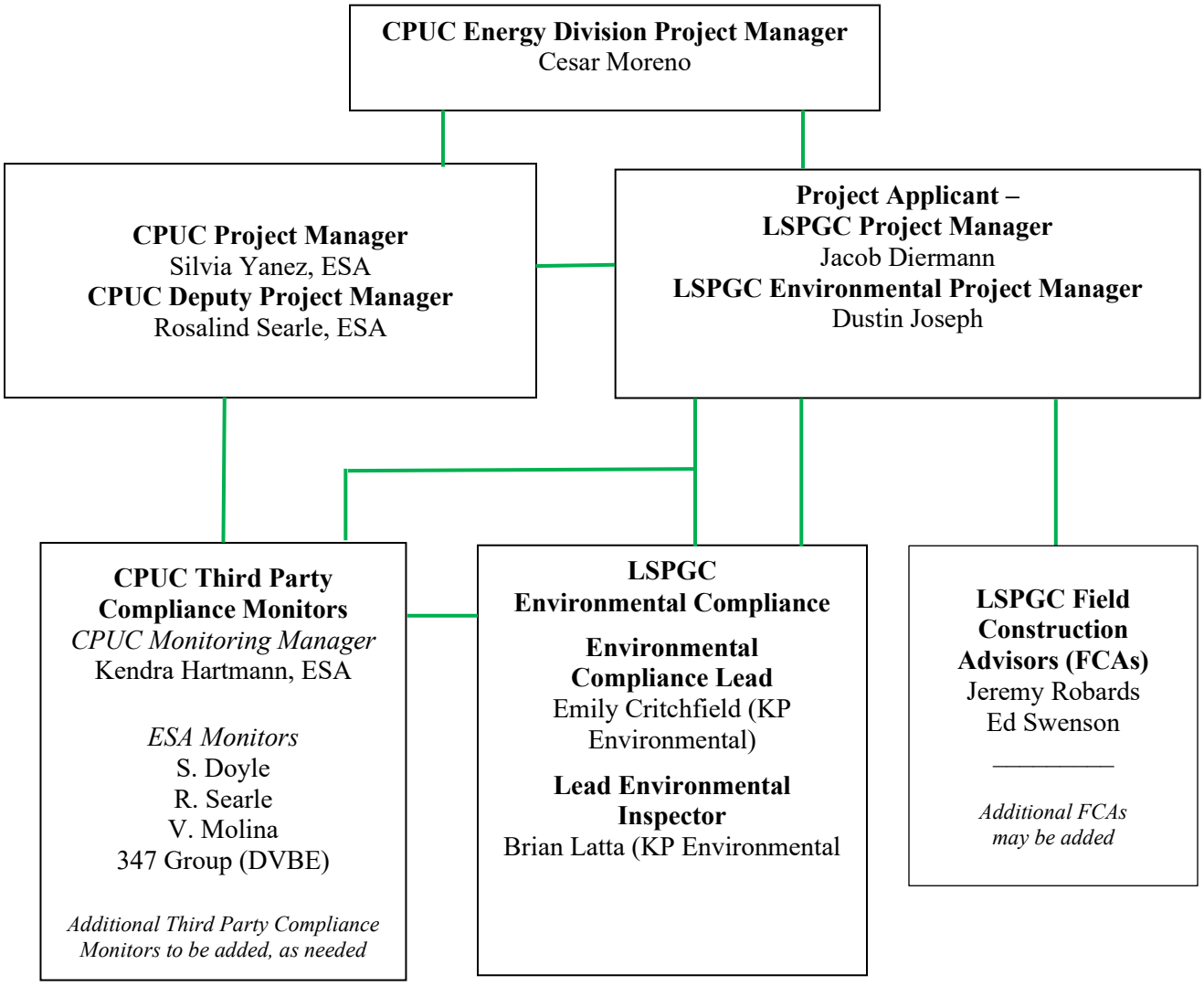
No minor project refinement will be approved by the CPUC if it creates new significant environmental impacts. As defined in this Construction MMCRP, a minor project refinement should be strictly limited to minor Project changes that will not trigger new discretionary permit requirements, that does not significantly increase the severity of an impact or create a new impact, and that clearly and strictly complies with the intent of the APMs or mitigation measures. A change to the Project that has the potential for creating significant environmental effects will be evaluated to determine whether supplemental CEQA review is required. The CPUC may approve such requests so long as such minor project refinements do not, without mitigation, result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the EIR; substantively conflict with any mitigation measure or applicable law or policy; or trigger an additional discretionary approval by the CPUC.

Any proposed deviation from the Approved Project and adopted APMs, BMPs, FPs, or mitigation measures, including correction of such deviation, shall be reported immediately to the CPUC project manager and the mitigation monitor assigned to the construction for their review and CPUC approval. In some cases, a minor project refinement may also require approval by a CEQA responsible agency.

This section describes specific CPUC and LSPGC roles, titles, and responsibilities for implementation of the Construction MMCRP. The organizational chart shown in **Figure 1** presents responsible staff and key communication pathways for the CPUC and its designated third-party monitoring team as well as the LSPGC applicant team, environmental consultants, and construction management.

As noted in Section 1, *Introduction*, PG&E is not an applicant for the Approved Project but has nonetheless committed to implement its own BMPs and FPs when completing its work herein and will submit monitoring reports documenting compliance with those measures to the CPUC for the Approved Project administrative record.

Figure 1 Organizational Chart



Legend: Green lines represent the primary communications pathway[4]

[4] This organizational chart presents primary communication pathways only and **does not preclude** communication among various CPUC or Project proponent field staff (e.g., Compliance Monitors, Environmental Consultants, and FCAs).

2.1 CPUC Mitigation Monitoring Team

2.1.1 CPUC Energy Division Project Manager

The CPUC Energy Division Project Manager (CPUC PM) is the lead representative for the CPUC and the sole CPUC employee on the CPUC Mitigation Monitoring Team. The CPUC PM will oversee the mitigation monitoring effort on behalf of the CPUC and is responsible for making final determinations regarding Construction MMCRP procedures, requirement clarifications, and resolution of compliance issues.

2.1.2 CPUC-designated Monitoring Manager

The CPUC PM is responsible for designating a Monitoring Manager who supports the CPUC PM and provides oversight of the mitigation monitoring effort. The responsibilities of the CPUC-designated Monitoring Manager include:

- Reviewing CPUC monitoring reports and discussing non-compliance issues with the CPUC PM;
- Reviewing reports and other documentation provided by LSPGC and PG&E for mitigation and permitting compliance;
- Reviewing minor project refinement requests and providing recommendations to the CPUC PM regarding approval;
- Acting as a project liaison on the CPUC's behalf to address community issues and concerns, if necessary;
- Working with the LSPGC and PG&E compliance personnel to resolve any issues and incidents under direction of the CPUC PM, and;
- Coordinating to a limited extent with other jurisdictional agencies, as needed (e.g., to resolve approval/permit condition conflicts).

Deputy Monitoring Managers may also be designated to stand in for the Mitigation Manager when needed and carry out assigned tasks. Any reference to the Mitigation Manager in this Construction MMCRP may be assumed to also apply to the Deputy Mitigation Manager when such designation is in effect.

2.1.3 CPUC-designated Third-Party Compliance Monitors

CPUC-designated third-party compliance monitors are the primary field personnel for the CPUC and are responsible for verifying compliance with Project requirements at the Project site(s) as directed by the CPUC PM and/or Mitigation Manager. Multiple monitors may be used as needed depending on whether there are concurrent construction activities and specific monitoring needs. The CPUC-designated third-party compliance monitors have technical expertise in their respective fields, as defined by resource- and subject-matter-specific monitoring plans. The responsibilities of the CPUC-designated third-party compliance monitors are to:

- Inspect the Project site(s), document construction and compliance activities,
- Report any potential compliance incidents,

- Conduct monitoring activities consistent with subject-specific monitoring plans, and
- Prepare and submit daily monitoring reports (for each day monitored) to the Mitigation Manager and relay any important information to the CPUC about the Approved Project, including any issues that occur in the field.

Many of the monitoring and compliance procedures will be conducted during the construction phase of the Project. LSPGC is responsible for integrating the mitigation monitoring procedures into the construction process in coordination with the CPUC and its designated third-party compliance monitoring staff. The third-party compliance monitor is responsible for monitoring that all procedures specified in this Construction MMCRP are followed by LSPGC and its contractors.

2.2 LSPGC Compliance Personnel

2.2.1 LSPGC Project Manager

LSPGC is responsible for designating the LSPGC PM who provides overall direction, management, leadership, and corporate coordination for the Project. The LSPGC PM's responsibilities include:

- Coordinating construction, engineering, and LSPGC's environmental personnel;
- Integrating environmental responsibilities into all levels of the Approved Project organization;
- Ensuring compliance with all APMs, mitigation measures, Approved Project stipulations, permit conditions, plan requirements, and the Construction MMCRP, and;
- Communicating Approved Project plans, activities, schedules, and public relations issues to the CPUC and LSPGC Project teams.

2.2.2 LSPGC Environmental Project Manager

LSPGC is responsible for designating at least one person to supervise the day-to-day compliance and permitting effort. The LSPGC Environmental Project Manager (EPM) may perform any duties that are delegated by the LSPGC PM. The LSPGC EPM is responsible for the overall management of environmental compliance and directly coordinates the activities of the LSPGC Environmental Compliance Lead (ECL), specialty monitors, and other field personnel as necessary. The EPM is the CPUC's main LSPGC point of contact for compliance-related issues. The EPM also communicates with LSPGC's Project management and construction personnel to ensure environmental compliance and adherence to measures contained in the Approved Project's Construction MMCRP. In addition to the above, the EPM responsibilities include, but are not limited to, the following:

- Communicate as needed with the LSPGC PM and ECL, and other Approved Project staff on environmental issues, including potential noncompliance events;
- Understand and plan for Approved Project requirements, environmental staffing needs, and construction needs;

- Coordinate LSPGC's environmental personnel, and ensure that qualified monitoring personnel are available and informed of the Construction MMCRP responsibilities and have been approved by the CPUC when applicable;
- Communicate environmental requirements to the LSPGC ECL and Field Construction Advisors (FCA)s;
- Communicate with the CPUC Mitigation Monitoring Team regarding environmental requirements, construction needs, construction schedule changes, and Construction MMCRP procedures;
- Review and confirm field compliance with Approved Project requirements;
- Report the effectiveness of mitigation and regularly submit required reports and documentation to the CPUC;
- Provide leadership to correct any issues regarding environmental compliance; and
- Participate in meetings and communicate with the CPUC PM and/or CPUC-designated Mitigation Manager as needed to support the Approved Project.

2.2.3 LSPGC Environmental Compliance Lead

LSPGC is responsible for designating at least one person to supervise the day-to-day Approved Project mitigation compliance effort. The LSPGC Environmental Compliance Lead (ECL) supports the role of the LSPGC EPM and performs any duties that are delegated by the LSPGC PM and the LSPGC EPM. The responsibilities of the ECL are similar to the Lead Environmental Inspector, with the primary difference being the daily interaction with construction and monitoring personnel in the field. Attendance at weekly construction meetings is expected, and coordination with construction to achieve the overall implementation of compliance measures and permits requirements is the responsibility of the ECL.

2.2.4 LSPGC Lead Environmental Inspector

LSPGC is responsible for designating at least one Lead Environmental Inspector (LEI), or an appropriate delegate trained to fulfill the role of the LEI, who can be present at the Approved Project site as needed to oversee and verify the Approved Project compliance effort. To oversee the monitoring procedures and to ensure success, the LEI assigned to the construction must be on site during any portion of LSPGC's construction that has the potential to create a significant environmental impact or other impact for which mitigation is required. The LSPGC LEI works closely with construction personnel and is the primary field employee responsible for verifying and documenting environmental compliance for LSPGC. The LSPGC LEI's responsibilities include, but are not limited to, the following:

- Understanding environmental Approved Project requirements and construction needs;
- Taking direction from the LSPGC EPM and ECL;
- Communicating construction needs and possible conflicts with environmental requirements to the LSPGC EPM and ECL;
- Supporting construction staff to ensure work is conducted in compliance with environmental requirements;

- Overseeing specialty monitoring activities, or performing such duties when appropriate and approved to do so;
- Coordinating with the CPUC-designated Mitigation Manager and field monitors;
- Implementing the Worker Environmental Awareness Program (WEAP) and associated trainings conducted in the field for new project personnel;
- Implementing communication procedures described in the Construction MMCRP;
- Providing direction to help avoid and/or minimize impacts to resources as specified by all Approved Project requirements, and;
- Determining the effectiveness of mitigation and reporting, and recommend adjustments when required to the LSPGC EPM and ECL.

The LSPGC LEI will coordinate with LSPGC's FCAs and Public Relations Officer regarding landowner access for surveys and construction activities. The LEI will participate in weekly or bi-monthly meetings and will be responsible for managing implementation of the WEAP in the field, including maintaining training logs. The LSPGC LEI will communicate with LSPGC's FCA, LSPGC's environmental compliance team, and its contractor's Environmental Compliance Specialist to coordinate monitoring and implement Approved Project environmental compliance requirements. The LEI will also be the main point of contact in the field for environmental resource monitors and CPUC compliance monitors during construction.

2.2.5 LSPGC Field Construction Advisor

LSPGC will identify one or more Field Construction Advisors (FCAs) who will provide oversight of LSPGC's Construction Worker Contractors. The FCA(s) will provide support to the LSPGC PM and oversee the activities of construction personnel. FCA responsibilities include:

- Implementing contractor compliance with LSPGC specifications, construction contracts, and applicable codes;
- Coordinating with LSPGC Compliance Personnel, such as the LSPGC ECL and LEI, regarding implementation of Approved Project APMs, mitigation measures, permit conditions, plan requirements, and Construction MMCRP procedures;
- Planning construction activities around environmental requirements and reporting any potentially infeasible requirements and work area constraints to LSPGC ECL;
- Communicating construction needs and schedule changes to the LSPGC ECL; and
- Regularly facilitating field meetings with construction and environmental staff.

3 Enforcement and Responsibility

LSPGC and PG&E are responsible for implementing monitoring and compliance procedures during construction consistent with the mitigation measures, APMs, BMPs, and FPs adopted by the CPUC. This responsibility includes ensuring compliance by its employees, contractors, and subcontractors thereof.

For the portion of the project implemented by LSPGC, the CPUC will oversee implementation of the procedures for monitoring through the third-party compliance monitors. For PG&E portions of the Approved Project not requiring prior approval by CPUC, PG&E will provide copies of compliance reports to CPUC. The monitors shall note problems with implementation of mitigation, notify appropriate agencies or individuals about any problems, and report the problems to the CPUC. The CPUC has the authority to halt any construction, operation, or maintenance activity associated with the Approved Project if the activity is determined to be a deviation from the Approved Project or adopted APMs, BMPs, FPs, or mitigation measures. The CPUC may assign its authority to its designated third-party compliance monitors.

The CPUC will enforce failure of LSPGC, PG&E, and/or their contractors to comply with the adopted mitigation measures, APMs, BMPs, and FPs. Enforcement may include implementing corrective actions to rectify environmental damages and/or to address any procedural deficiencies that led to the failure, including amending this Construction MMCRP. The CPUC may pursue additional enforcement through other means, including implementation of the CEQA Citation Program pursuant to Commission Resolution E-4550 (May 9, 2013).

Other jurisdictional agencies, such as local agencies, may have the independent authority to halt specific construction, operation, or maintenance activities associated with the Approved Project within their respective jurisdictions if the activities are determined to be a deviation from permits or approvals issued by said agency.

4 Minor Project Refinements

4.1 LSPGC

As discussed under *Roles and Responsibilities* above, the CPUC — along with its third-party compliance monitors — will ensure that the minor project refinement process, or any deviation from the procedures identified under the monitoring program, is consistent with CEQA requirements. No Approved Project deviation will be approved as a minor project refinement by the CPUC if it creates new significant environmental impacts. As defined in this Construction MMCRP, any deviation should be strictly limited to minor project refinements that will not trigger other discretionary permit requirements, that does not increase the severity of an impact or create a new impact, and that clearly and strictly complies with the intent of the mitigation measure. Any refinement to the Approved Project that has the potential to create significant environmental effects will be evaluated to determine whether supplemental CEQA review is required. Any proposed deviation from the Approved Project and adopted APMs or mitigation measures, including correction of such deviation, shall be reported immediately to the CPUC and the third-party compliance monitors assigned to the construction for their review and CPUC approval. In some cases, a deviation may also require approval by a CEQA responsible agency.

The CPUC PM will evaluate any proposed changes from the Approved Project to determine whether they are consistent with the Approved Project as approved by the CPUC, as well as with the approved CEQA mitigation requirements. If the CPUC PM determines the changes requested by LSPGC to be consistent with the Approved Project and CEQA mitigation requirements, the requested change(s) would be processed as a minor project refinement by the Energy Division

using the Minor Project Refinement Form (**Appendix B**). Requests for minor project refinements must be made in writing and sent electronically to the CPUC PM, with a copy to the CPUC Mitigation Manager.

Requests for CPUC approval of a project change via the minor project refinement process must be made in writing and should include the following:

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

The CPUC PM may request additional information, agency consultations, or a site visit to process the request. The proposed minor project refinement may not be implemented until approved by the CPUC PM. Any proposed deviation from the Approved Project and adopted APMs or mitigation measures, including correction of such deviation, shall be reported immediately to the CPUC PM and the third-party mitigation monitor assigned to construction for their review and CPUC approval. In some cases, a minor project refinement also may require approval by a CEQA responsible agency. A change to the Approved Project that has the potential to create new or substantially more severe significant environmental effects, even with the implementation of the relevant APMs and/or mitigation measures, is expected to require supplemental CEQA review. Even without triggering supplemental CEQA review, if the minor project refinement exceeds the scope of the CPUC's original approval, additional discretionary approvals from the CPUC may become necessary.

4.2 PG&E

As PG&E is not an applicant for this Project, this minor project refinement process is not applicable to any portion of the Project under PG&E's responsibility. However, PG&E is subject to reporting responsibilities pursuant to this Construction MMCRP. If PG&E identifies any modifications to its portion of the Project, it should use the Minor Project Refinement Form in Appendix B to document the consistency of those modifications with the impact findings and conditions in the Final EIR and MMCRP—i.e., to demonstrate that the modifications comply with the intent of the CPUC-recommended mitigation measures and adopted BMPs and FPs and

would not trigger new discretionary permit requirements, increase the severity of an impact, or create a new impact—then send the form to the CPUC PM, copying the CPUC MM, for CPUC concurrence.

5 Mitigation Compliance Responsibility

LSPGC is responsible for successfully implementing all of the adopted APMs and LSPGC mitigation measures in this MMCRP. This Construction MMCRP contains criteria that define whether mitigation is successful. Standards for successful mitigation also are implicit in many mitigation measures that include such requirements as obtaining permits or avoiding a specific impact entirely. Additional mitigation success thresholds will be established by applicable agencies with jurisdiction through the permit process and through the review and approval of specific plans for the implementation of mitigation measures.

LSPGC shall inform the CPUC PM and CPUC Mitigation Manager in writing of any mitigation measures that are not or cannot be successfully implemented. The CPUC PM, in coordination with the CPUC Mitigation Manager and additional third-party compliance monitoring staff, will assess whether alternative mitigation is appropriate and will specify to LSPGC the subsequent actions required.

5.1 Dispute Resolution Process

The following procedure will be observed for dispute resolution between the CPUC's third-party compliance monitors, CPUC MM staff, and LSPGC:

- Disputes and complaints should be directed first to the CPUC's Project Manager for resolution.
- Should this informal process fail, the CPUC Project Manager may initiate enforcement or compliance action to address deviations from the approved Project.

5.2 LSPGC Monitoring and Compliance Reports

LSPGC's LEI available as needed to assist with the coordination of environmental monitors and specialists, assist construction staff with the interpretation of APMs and mitigation measures, and to provide timely course corrections (in the event of compliance issues). LSPGC's ECL will also be available to assist with these tasks.

"Look Ahead" Reports

LSPGC will submit "look ahead" status reports on Fridays communicating the upcoming anticipated construction activities. The look ahead reports will forecast activities for at least the upcoming two weeks and will additionally forecast activities one week beyond the upcoming two weeks when available and relevant (if available). The look ahead reports will include the type of work activity (i.e., clearing vegetation, grading, trenching, or the construction of structures), locations for each work activity, and the days for each planned activity. The CPUC mitigation monitoring team will communicate with the LEI to confirm daily work locations and schedule, as needed. The LSPGC EPM/ECL/FCA shall immediately contact the CPUC Mitigation Manager

and Deputy Mitigation Manager when the anticipated construction schedule changes monitoring needs outside the look ahead update.

Daily Monitoring Reports

All LSPGC environmental monitors and inspectors will prepare daily monitoring reports or logs, as appropriate for the discipline. In addition to the daily monitoring reports and logs, the LSPGC LEI will complete a daily compliance checklist documenting the Approved Project's compliance with applicable mitigation measures, APMs, and permit conditions for that day.

Compliance Summary Reports

In the event of a minor deviation (defined below) and/or non-compliance (defined below), LSPGC will prepare a Compliance Summary Report for the week, ending Friday, in which the minor deviation(s) and/or noncompliance event(s) occur. The Compliance Summary Reports will briefly summarize compliance activities undertaken, specifically those responding to Project issues, within the reporting period (one week), including any minor deviations and non-compliance records that occurred within that week. The Compliance Summary Reports will also include a brief summary of the construction activities that occurred during the reporting period. LSPGC will submit each Compliance Summary Weekly Report to the CPUC no later than the Wednesday following the Friday of the reporting period. The Compliance Summary Reports are not required for weeks in which no minor deviations or noncompliance events occur.

Quarterly reports

LSPGC shall provide the CPUC with written quarterly reports of the Approved Project, which shall include progress of construction, resulting impacts, mitigation implemented, and all other noteworthy elements of the Approved Project. The quarterly reports shall also include a summary of specialty and resource monitoring, WEAP training sign-in sheets, daily monitoring logs, complaints (e.g., public and noise complaints) and resolution logs, site photographs, and any other compliance actions undertaken. Quarterly reports shall be required as long as mitigation measures are applicable. LSPGC will submit each quarterly report no later than the last day of the month following the final month of the quarterly reporting period.

Non-Compliance Incidents and Stop Work Orders

Through observations from the mitigation monitoring team, the CPUC PM may determine if any construction activity deviates from permit conditions, notices to proceed (NTPs), APMs, or mitigation measures, particularly when the activity puts a sensitive resource at risk. Such activities should be considered a non-compliance incident. A non-compliance incident may include failure to fully comply with all terms and conditions in permits or approvals from other federal, state, and local agencies that are relied upon in the mitigation measures and APMs.

- **Minor Deviation.** This level indicates that a minor deviation from an APM approved project element, or mitigation measure has been identified and action is being taken in the field to immediately remedy the situation. No resources are being impacted and no potential for resource damage exists. If a minor deviation is not expeditiously corrected, it would become a non-compliance issue.

- **Non-compliance**. One or more aspects of an APM or mitigation measure have not been complied with, making the mitigation ineffective and resulting in significant impacts or minor impacts which, if the impact occurs quickly and/or is allowed to continue, could result in a significant impact over time. Non-compliance may also include one or more of the aspects of an APM or mitigation measure not being complied with and the implementation of an APM or mitigation measure being deficient or nonexistent, resulting in significant impact(s), or immediate threat of major, irreversible environmental damage or property loss. The protocol outlined below for a non-compliance incident will be followed in the event the non-compliance is identified by a third-party compliance monitor and/or the LSPGC LEI.

All minor deviations will be reported by the third-party compliance monitors, and/or the LEI, to the LSPGC ECL to be reported to the CPUC Mitigation Manager in Compliance Summary Reports unless the issue is of such severity that it is likely to become non-compliance and/or informal corrective action was unsuccessful. Minor deviations that do not result in non-compliance and have successful corrective action should be briefly summarized in a Compliance Summary Report as described above. Where minor deviations are likely to become non-compliance and/or where informal corrective action was unsuccessful or ineffective, the issue should be reported to the CPUC Mitigation Manager and CPUC PM within 24 hours and further documented in a Compliance Summary Report.

All non-compliance activity will be reported by the third-party compliance monitors, CPUC Mitigation Manager, and/or the LEI to the LSPGC ECL/EPM/PM, who will immediately notify the CPUC Mitigation Manager and CPUC PM either verbally or via email. The details of this initial contact will be documented in the non-compliance incident report. Based on the severity or pattern of noncompliance activity, the CPUC PM has the authority to stop project construction activities. If a stop-work order of construction activity occurs, construction shall not resume until the CPUC PM authorizes it to do so. No third-party compliance monitor personnel have the authority to stop or restart construction activities on a component- or project-wide scale. However, third-party compliance monitors have the authority to redirect work if an immediate threat to the safety of a sensitive resource is imminent.

If LSPGC discovers a non-compliance incident of any magnitude, the CPUC PM must be immediately notified either verbally or by email. When LSPGC observes a noncompliance incident, the affected construction activities will be stopped immediately such that the non-compliant activities cease. The typical reporting structure for non-compliance incidents observed by the LSPGC team is as follows:

1. Monitor or other project personnel observes a potential non-compliance.

2. The Monitor immediately notifies the LEI, who notifies the FCA and ECL. Either the FCA or LEI will implement a temporary stop work order if warranted.

3. The ECL will immediately notify the CPUC. If the ECL is unavailable, either the LEI or LSPGC Project Manager may notify the CPUC.

4. The LEI will work with the ECL and FCA to implement corrective actions if needed to prevent further noncompliance or impact to resources.

At the time of the initial notification, LSPGC may not have all the relevant information pertaining to the potential non-compliance. Nonetheless, LSPGC will not wait for all the information before notifying the CPUC. Notification of an investigation into a non-compliance occurrence will be provided within 24 hours. Once LSPGC has completed its investigation of the potential non-compliance, the non-compliance incident report will be completed and submitted to the CPUC. The event, the status of the investigation, and any corrective actions will be summarized in the Compliance Summary Report.

Non-compliance incidents may also be observed by CPUC third-party compliance monitors and brought to the attention of LSPGC with concurrent immediate reporting to the CPUC. To facilitate tracking for such incidents, a non-compliance incident report form is provided as **Appendix C**. LSPGC must track all non-compliance incidents and document the incidents and implementation of corrective actions in its Compliance Summary Reports.

5.3 CPUC Monitoring and Compliance Reporting

Third Party Compliance Monitor

Site visits and specified monitoring procedures performed by other individuals will be reported to the third-party compliance monitor assigned to the construction. A monitoring record form will be submitted to the third-party compliance monitor by the individual conducting the visit or procedure so that details of the visit can be recorded and progress tracked by the third-party compliance monitor. A checklist will be developed and maintained by the third-party compliance monitor to track all procedures required for each mitigation measure and to ensure that the timing specified for the procedures is adhered to. An example site inspection compliance form is provided as **Appendix D**.

The third-party compliance monitor will note any problems that may occur and take appropriate action to rectify the problems. Any deviations from APMs, mitigation measures or Project plans observed by the LEI, resources monitors or CPUC compliance monitors will be immediately communicated to the LSPGC FCA, EPM and ECL. The LEI and FCA have authority to call a work stoppage due to fire, health, and safety and/or compliance concerns, as described below.

The CPUC third-party compliance monitors will contact the LSPGC LEI and PG&E Project Manager (or Construction Manager) if an activity is observed that conflicts with one or more of the APMs or mitigation measures, consistent with the fuller procedures discussed in “Non-Compliance” above.

The CPUC third-party compliance monitors will also contact the LSPGC LEI regarding day-of construction crew work locations; the status of APMs, BMPs, FPs, mitigation measures, and Approved Project plans; and the overall construction schedule. Much of this information can be obtained through participation in tailgate meetings prior to the start of construction each day.

The CPUC third-party compliance monitors may discuss construction procedures directly with the FCA and/or PG&E Construction Monitor, but such discussions should generally be limited to basic questions pertaining to clarification of daily project activities and mitigation measure compliance as they relate to monitoring responsibilities. The CPUC third-party compliance

monitors will not provide work directions to the contractor or LSPGC's environmental monitors and will avoid directing questions to the construction crews, unless previously specifically approved by LSPGC LEI or the CPUC PM.

CPUC Monitoring Manager

The CPUC Mitigation Manager/Deputy Mitigation Manager will provide a weekly report to the CPUC PM summarizing mitigation implementation and updates on any corrective actions. This schedule may be altered at the discretion of the CPUC PM in consultation with the CPUC Mitigation Manager depending on the construction activity occurring at a given time or the presence/absence of resources in the current area of activity.

The CPUC Mitigation Manager/ Deputy Mitigation Manager will compile quarterly reports to be submitted to the CPUC PM at the close of the calendar quarters (i.e., January, April, July, and October). The quarterly reports will provide an overview of the project construction activities completed during the quarter, as well as consolidated reports of noncompliance and corrective actions, APM and mitigation implementation/completion, and minor project refinements.

6 Construction Schedule and Communication Procedures

6.1 Construction Schedule

In the event that situations occur requiring major changes pertaining to the construction schedule, LSPGC will keep the CPUC mitigation monitoring team informed. The construction of the Approved Project is estimated to begin in March 2026 and conclude by February 2028. Testing and commissioning activities will overlap construction activities and are anticipated to continue through 2028

6.2 Communications

As clear communications are key to a successful environmental compliance program, the CPUC and LSPGC environmental and construction personnel will maintain regular interaction in a manner that is professional and mutually responsive. Close coordination to address and resolve issues will be observed throughout the duration of construction. This section presents a communication protocol to accurately and efficiently exchange information regarding site surveys, APMs, mitigation measures, construction activity, contractor oversight, and planned or upcoming work prior to the start of a given phase of construction. The protocols for communication may be refined to address specific issues as day-to-day construction proceeds.

Field Staff Communication

The CPUC mitigation monitoring team, LSPGC, and construction staff can address many issues arising during construction through regular communication. All field staff will be equipped with cell phones or two-way radios to communicate in the field as needed. Off-site staff will be available during normal business hours via email or phone. A contact list for key staff is included as **Appendix E**. Changes to key staff should be reported to the CPUC PM and CPUC Mitigation Manager as quickly as possible. The contact list will be maintained and updated by the CPUC PM.

Third-Party Compliance Monitor

The third-party compliance monitor's primary point of contact in the field is the LEI. The third-party compliance monitor will contact the LEI if an activity is observed that conflicts with one or more of the MMs or APMs so that the situation can be corrected. If the third-party compliance monitor cannot immediately reach the LEI, then the FCA, CM, LSPGC EPM, LSPGC PM, or ECL will be contacted to address the problem. The third-party compliance monitors will then promptly notify the CPUC Mitigation Manager and CPUC PM of the problem and what resolution, if any, has been already implemented. The third-party compliance monitors will not direct the contractor unless specifically provided for in the text of the mitigation measure and/or APM; however, the third-party compliance monitors have the authority to stop work, assuming it is safe to do so, if an activity poses an imminent threat or puts a sensitive resource at undue risk (e.g., stopping a clearing crew from unknowingly clearing vegetation in an exclusion area).

CPUC Monitoring Manager

The CPUC Mitigation Manager/Deputy Mitigation Manager will be responsible for overseeing the third-party monitoring team and ensuring that any outstanding noncompliance issues are resolved. The CPUC Monitoring Manager/Deputy Mitigation Manager will also be the liaison between the third-party monitoring team and the CPUC PM.

On a weekly basis, the CPUC Monitoring Manager/Deputy Mitigation Manager (and third party monitoring team) will receive from the LEI information on where construction crews will be working during the next reporting period, the status of mitigation measures and APMs, any noncompliance issues (resolved or otherwise), and schedule forecasts (e.g., one-week or multiple-week "look-aheads") to schedule third-party compliance monitors.

LSPGC EPM/ECL and LSPGC FCA

The LSPGC EPM/ECL shall provide Compliance Summary Reports when minor deviations and/or noncompliance events occur, as described above under Mitigation Compliance Responsibility. The Weekly Compliance Summary Reports will compile a record of mitigation measure implementation by LSPGC-supplied monitors and the construction team.

Construction Personnel

A key feature contributing to the success of mitigation monitoring will be obtaining the full cooperation of construction personnel and supervisors. Many of the mitigation measures and APMs require action on the part of the construction supervisors or crews for successful implementation. To ensure success, the following actions, detailed in specific mitigation measures included in this Construction MMCRP, will be taken:

- LSPGC shall require all contractors to comply with the conditions of Project approval, including all applicable APMs and mitigation measures.
- One or more pre-construction meetings will be held to inform all and train construction personnel about the requirements of the Construction MMCRP. This will be incorporated into the WEAP Training that all Project personnel must complete.

- A written summary of mitigation monitoring procedures will be provided to construction supervisors for all APMs and mitigation measures requiring their attention.

LSPGC will also be responsible for retaining the qualified archaeologists, qualified biologists/ biological monitors, qualified paleontologists, licensed engineers, qualified environmental trainers, LEIs, etc., specified in the adopted APMs and mitigation measures. These monitors and resource specialists have the authority to pause construction if applicable to carry out their monitoring duties. For example, archaeological monitors often pause excavation activities to safely observe or inspect spoils or cut walls.

6.3 Public Access to Records

The CPUC will make monitoring records and reports available for public inspection upon request, except where subject to relevant confidentiality laws (e.g., certain archaeological and Tribal Cultural Resource information, personal identifying information of staff). The CPUC, LSPGC, and PG&E will develop a filing and tracking system. Any confidential materials or reports will be summarized in the LSPGC-prepared Compliance Summary Reports; however, all confidential materials (such as archaeological monitoring reports) will be omitted. Instead, these reports and information will be transmitted directly from the LSPGC technical staff to the CPUC equivalent, who will then ensure information is properly marked prior to transmission to the CPUC PM for inclusion with the administrative record. Sensitive and confidential materials will not be made available for public inspection.

6.4 Condition Effectiveness Review

In order to fulfill its statutory mandates to mitigate or avoid significant effects on the environment and to design a MMCRP to ensure compliance during project implementation (Pub. Res. Code §21081.6):

- The CPUC may conduct a comprehensive review of conditions which are not effectively mitigating impacts at any time it deems appropriate, including as a result of the Dispute Resolution procedure outlined above; and
- If in either review, the CPUC determines that any conditions are not adequately mitigating significant environmental impacts caused by the project, or that recent proven technological advances could provide more effective mitigation, then the CPUC may impose additional reasonable conditions to effectively mitigate these impacts.

These reviews will be conducted in a manner consistent with the CPUC's rules and practices.

Mitigation Monitoring, Compliance, and Reporting Program

The table attached to this Construction MMCRP as Appendix A contains all of the adopted LSPGC APMs, LSPGC mitigation measures, PG&E BMPs, PG&E FPs, and PG&E mitigation measures in the Final EIR, as adopted and ordered by the CPUC. The purpose of the table is to provide a single comprehensive list of impacts, mitigation measures, adopted APMs, BMPs, FPs as described in the Final EIR. LSPGC proposed APMs to minimize environmental impacts associated with implementation of the Approved Project. PG&E proposed BMPs and FPs associated with implementation of the Approved Project. In some instances, those APMs, BMPs,

and FPs have been superseded by CPUC-required mitigation measures, as described in the Final EIR. The table in Appendix A identifies those APMs that will be implemented as part of the Project, as well as the applicable BMPs and FPs to be implemented by PG&E for interconnection of the Project.

APPENDIX A
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE POWER SANTA CLARA VALLEY PROJECT

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Applicant Proposed Measures				
Aesthetics	**APM AES-1: Maintenance of Construction Areas** All Project construction sites shall be maintained in a clean and orderly state. Temporary construction and permanent security nighttime lighting shall be directed away from residential areas and have shields to prevent light spillover effects. Upon completion of Project construction, staging and temporary work areas shall be returned to pre-Project conditions, including re-grading of the site and re-vegetation or re-paving of disturbed areas to match pre-existing contours and conditions.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	During construction
Aesthetics	**APM AES-2: Site Design and Landscape Management Plan** A Site Design and Landscape Management Plan shall be developed for the Skyline and Grove terminals and could include, but not be limited to, the following requirements: • Structures and equipment at the proposed HVDC terminals shall have a non-reflective finish and a beige, grayish hue, or neutral earth-tone colors to the extent practicable. • Existing vegetation along the proposed Grove terminal western site boundary shall remain and be maintained unless safety and security would be compromised. Consideration of local guidance documents, where applicable, such as the City of San Jose Guadalupe River Park & Gardens Urban Design Guidelines (2003), unless safety and security would be compromised, or if it would interfere with the future operations and maintenance of the facility.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Air Quality	**APM AQ-1: Construction Fleet Minimum Requirements and Tracking** LSPGC shall ensure that at least 75 percent of equipment horsepower hours related to off-road construction equipment include Tier 4 interim or 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 their 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 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 to track the Project's compliance. The updated tracking tool shall be submitted to the CPUC no later than the tenth day of the following month.	Superseded by MM 3.3-2a	N/A	N/A

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Air Quality	**APM AQ-2: Dust Control Best Management Practices (BMPs)** LSPGC shall implement the following measures, as needed, to control fugitive dust during construction activities: • 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 regiment 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 tracked 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 miles per hour (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 shall be suspended when average wind speeds exceed 20 mph. • All trucks and equipment, including their tires, shall be washed off or otherwise cleaned prior to leaving the site. • 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. • Publicly visible signs shall be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations.	Superseded by MM 3.3-2c	N/A	N/A
Air Quality	**APM AQ-3: Naturally Occurring Asbestos Compliance** LSPGC shall ensure that construction activities comply with existing regulations pertaining to naturally occurring asbestos (NOA), including the CARB Airborne Toxic Control Measures (ACTMs) for NOA, when construction activities have the potential to encounter NOA. ACTM for NOAs include dust control measures consistent with APM AQ-2.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	During construction
Biological Resources	**APM BIO-1: Restoration of Disturbed Areas** Once construction is complete in a given area, natural vegetation areas 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.	LSPGC and its contractors to implement measure as defined.	CPUC mitigation monitor to inspect compliance	During and following construction, and prior to construction close out of the Project

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources	**APM BIO-2: Rare Plant Surveys** Protocol surveys and preconstruction surveys shall be conducted within all Project impact areas, and suitable buffers shall be established within suitable habitat areas for special-status plants. 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 consult with the USFWS and/or CDFW for ITPs. Preconstruction surveys shall be conducted within Project impact areas 14 to 30 days prior to the start of construction for any rare plants that are identified during the focused surveys. 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.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Biological Resources	**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 areas that contain 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 ITPs. 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.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction, during all ground disturbing and vegetation removal activities
Biological Resources	**APM BIO-4: Sensitive Area Demarcation** All sensitive biological areas (including creeks, rivers, wetlands, 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.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to construction
Biological Resources	**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.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Biological Resources	**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 when 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 to reduce accidents and animal road mortality.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources	**APM BIO-7: Outdoor Lighting Measures** The use of outdoor lighting during construction and O&M shall be minimized whenever practicable. Photocell and motion detection-controlled lighting shall be provided at a level sufficient to provide safe entry and exit to the Project terminals and control enclosures and for security purposes. All lighting shall be selectively placed, shielded, and directed downward 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.	LSPGC and its contractors to implement measure as defined.	CPUC mitigation monitor to inspect compliance	During construction, operation and maintenance of the Project
Biological Resources	**APM BIO-8: Worker Environmental Awareness Program (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.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Biological Resources	**APM BIO-9: Nesting Bird and Roosting Bats Protection** If feasible, LSPGC shall avoid certain construction activities such as vegetation trimming/ removal during the migratory bird nesting and breeding and roosting bat seasons. When it is not feasible to avoid construction during these seasons, LSPGC shall perform a nesting bird and roosting bat survey in the area where the work is to occur. 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 buffer shall be implemented to ensure that the nesting or breeding activities are not substantially adversely affected. If the nesting or breeding activities are being conducted by a Federal or State-listed species, LSPGC shall consult with the USFWS and CDFW as necessary. A qualified biologist shall monitor the nest until the birds have fledged or construction is no longer occurring on the site.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Biological Resources	**APM BIO-10: San Joaquin Kit Fox Surveys** Protocol surveys and preconstruction survey sweeps shall be conducted within all proposed impact areas and suitable buffers within suitable habitat areas for San Joaquin kit fox (SJKF). In the event of the discovery of occupied burrows and/or SJKF 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. Any other construction activities that may impact SJKF, including movement of construction equipment and other activities outside of the fenced/paved areas within suitable habitat, would be monitored by a qualified biologist. The qualified biologist shall have the authority to stop work activities upon the discovery of suitable burrows or live individuals and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to SJKF.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Biological Resources	**APM BIO-11: Excavation Wildlife Safety BMPs** 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.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	During construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources	**APM BIO-12: Special-Status Bird Surveys** Protocol surveys shall be conducted for Swainson's hawk and bald eagle; focused surveys shall be conducted for tricolored blackbird and other raptors; and preconstruction survey sweeps shall be conducted within all proposed impact areas and suitable buffers within suitable habitat areas for Swainson's hawk, tricolored blackbird, bald eagle, burrowing owl, 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 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 ITP in consultation with CDFW. If impacts are identified during species-specific surveys for the other State-listed bird species that are not covered under the Santa Clara Valley HCP (Swainson's hawk, bald eagle, and any other bird 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.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Biological Resources	**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.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Biological Resources	**APM BIO-14: Nesting Bird Surveys** Preconstruction nest surveys shall be conducted within all proposed impact areas and suitable buffers within suitable habitat areas for Migratory Bird Treatment Act (MBTA)-protected birds. In the event of the discovery of an active nest, 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. Any other 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.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources	**APM BIO-15: 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 bay checkerspot butterfly, monarch butterfly, 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. Bay checkerspot butterfly is a covered species under the Santa Clara Valley HCP. If avoidance of the bay checkerspot butterfly is not possible, the take for this species shall be covered under the Santa Clara Valley HCP or under a Federal ITP in consultation with the USFWS. If impacts are identified during species-specific surveys for Monarch butterflies or Crotch's bumblebee which are not covered under the Santa Clara Valley HCP, the take shall be covered under a Federal ITP (monarch butterfly; Federal candidate species) or State ITP (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.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Biological Resources	**APM BIO-16: Special-Status Amphibian Surveys** Protocol surveys shall be conducted for California tiger salamander and California red-legged frog; focused surveys shall be conducted for foothill yellow-legged frog; and preconstruction surveys shall be conducted within all proposed impact areas and suitable buffers within potentially suitable habitat areas for California tiger salamander, California red-legged frog, and foothill yellow-legged frog. 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. 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.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Cultural Resources	**APM CUL-1: 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;	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to and during all Project activities

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	• 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).			
Cultural Resources	**APM CUL-2: Cultural Resources Monitoring** Archaeological and Native American monitoring shall be conducted during ground disturbance associated with the Project when within 100 feet (30 meters) of previously recorded prehistoric, 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 meters) of previously recorded historic-period resources, or after unanticipated discovery of the same. Prehistoric and/or ethnohistoric archaeological sites have been recorded within the Project area, and the Sacred Lands File (SLF) search and Tribal outreach indicates that lands sacred to the Muwekma Ohlone Indian Tribe of the San Francisco Bay Area, the Ohlone Indian Tribe, the Tamien Nation, and the Amah Mutsun Tribal Band are present within the Project search area. In addition, historic era archaeological sites have been recorded within the Project area. 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 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 AB 52 process or otherwise.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to confirm compliance	During construction
Cultural Resources	**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	LSPGC and its contractors to implement measure as defined	CPUC to review and approve CRMP. CPUC mitigation monitor to confirm compliance	During all Project activities

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	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.			
Cultural Resources	**APM CUL-4: Cultural Resources Inventory** The temporary construction staging areas 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. Cultural resource inventory of temporary construction staging areas and/or new areas shall consist of a pedestrian archaeological survey conducted at 10-meter or less transects. If cultural resources are encountered, 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 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 CRHR eligibility of the resources and, in consultation with the CPUC, determine appropriate treatment measures. Consistent with CEQA Section 15126.4(b)(3), if it is demonstrated that resources cannot be feasibly avoided, LSPGC's qualified archaeologist, in consultation with the CPUC and, if the resource is prehistoric or Native American in nature, the Tribal representative, 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.	LSPGC and its contractors to implement measure as defined	CPUC to review and approve CRMP. CPUC mitigation monitor to confirm compliance	During construction
Cultural Resources	**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.	LSPGC and its contractors to implement measure as defined	CPUC to review and approve CRMP. CPUC mitigation monitor to confirm compliance	During all Project activities

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Geology, Soils, and Paleontological 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.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to any Project-related ground disturbing activities and during construction
Geology, Soils, and Paleontological Resources	**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 below ground surface 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.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to any Project-related ground disturbing activities and during construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	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.			
Geology, Soils, and Paleontological Resources	**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.	LSPGC and its contractors to implement measure as defined	LSPGC qualified paleontologist to inspect compliance. CPUC mitigation monitor to confirm compliance	During construction
Hazards, Hazardous Materials, and Public Safety	**APM HAZ-1: Site-Specific Spill Prevention, Control, and Countermeasure Plan (SPCCP)** 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.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to and during construction
Hazards, Hazardous Materials, and Public Safety	**APM HAZ-2: Hazardous Materials Management Plan (HMMP)** 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.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to and during construction activities

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	The Project would also have lead-acid batteries to provide backup power for monitoring, alarm, protective relaying, instrumentation and control, and emergency lighting during power outages. Secondary containment shall be constructed around and under the battery racks, and the HMMP shall address containment from a battery leak. 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.			
Hazards, Hazardous Materials, and Public Safety	**APM HAZ-3: Skyline Terminal Soil and Groundwater Contamination Management** Construction activities at the Skyline terminal (within the College Park Parcel 2 site) shall comply with the SMP that was prepared as part of the Covenant for the Skyline terminal property. This includes, but is not necessarily limited to: • Soil sampling before construction begins shall be conducted to identify the presence of contamination and specific contaminants. • Impacted soils, if encountered, shall be stockpiled on-site in approximate 100 to 250 CY volumes. The soil stockpiles shall be covered with 10-mil plastic sheeting and secured to prevent dust or runoff during storm events. All appropriate dust control and stormwater BMPs shall be implemented during the soil mitigation activities. • Upon completion of excavation work and confirmation sampling, the excavation shall be backfilled with the excavated soil or clean import fill. Import fill shall be tested in general accordance with DTSC requirements, prior to acceptance. Imported soil shall be placed in accordance with the Project's geotechnical engineer's recommendations. In addition to adherence to the SMP, LSPGC shall implement measures to address potentially contaminated groundwater, if encountered. If groundwater is encountered during construction at the proposed Skyline terminal site, it shall be sampled prior to disposal. If dewatering must occur, groundwater shall be pumped directly to baker tanks (or similar) portable storage tanks. The groundwater shall not be transported or disposed of until it has been tested for possible contamination. All groundwater extracted from the Skyline terminal site shall be handled, transported, and disposed according to applicable laws and regulations.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to inspect compliance	Prior to and during construction
Hazards, Hazardous Materials, and Public Safety	**APM HAZ-4: Soil Management Plan** A Soil Management Plan shall be prepared prior to construction that identifies specific steps necessary to properly identify, handle, treat, and dispose of potentially contaminated soils throughout the Project area where known contamination occurs in close proximity to project-related ground disturbance. The Soil Management Plan shall include, but not be limited to, the following requirements: • Prior to commencement of construction activities within the 12 contaminated sites discussed above, the soil along the path of the underground alignment shall be sampled to identify any potential contaminants. The soil sampling shall include testing for specific contaminants identified in agency records. • If sampling identifies soil contaminated above hazardous waste levels, the soil shall be contained and disposed of at a licensed waste facility. The presence of known or suspected contaminated soil shall require testing and investigation procedures to be supervised by a qualified person, as appropriate, to meet state and federal regulations.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to inspect compliance.	Prior to and during construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	• In the event that soils suspected of being contaminated (on the basis of visual, olfactory, or other evidence) are removed during site grading activities or excavation activities, the excavated soil shall be tested, and if contaminated above hazardous waste levels, shall be contained and disposed of at a licensed waste facility.			
Hazards, Hazardous Materials, and Public Safety	**APM HAZ-5: Final Induction Study and Utility Coordination** Design and construction of the proposed transmission lines shall be coordinated with existing utility owners (as applicable) to ensure that operation of the new transmission lines shall not cause unsafe electromagnetic induction effects on any existing metallic utilities located in close proximity to the proposed transmission lines. LSPGC shall conduct a detailed induction study for all existing metallic utilities in close proximity to proposed transmission line alignments. Where potential adverse effects are identified by the Final Induction Study, LSPGC shall coordinate with the applicable utility owner to develop appropriate mitigation measures. Final designs and mitigation strategies, if required, shall be submitted to the CPUC prior to commencement of construction of the transmission lines.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to and during construction
Hydrology and Water Quality	**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 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; • 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).	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	During construction
Noise	**APM NOI-1: Vibration Monitoring for High Vibratory Equipment Contingency Plan** Once the final design and alignment are determined for the proposed Grove to Skyline 320 kV DC transmission line, a site survey would be conducted along segments of the proposed transmission line alignment where construction may occur within 25 feet of existing structures to determine if any vibration sensitive structures are located within 25 feet of vibration-inducing construction activities. Vibration sensitive structures are those structures at least 50 years old, or generally constructed before approximately 1974. If construction with high vibratory equipment occurs within 25 feet of such structures, a Vibration Monitoring for High-vibratory Equipment Contingency Plan would be implemented. The Vibration Monitoring for High-vibratory Equipment Contingency Plan would be implemented to include the following, as necessary, to prevent vibration damage to vibration sensitive structures: • Identification of vibration-sensitive structures within 25 feet of the final transmission line alignment where high vibratory equipment is planned to be used.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	• Where such structures are identified, LSPGC would attempt to use the following measures as necessary to avoid construction vibration impacts: – Place operating equipment on the construction site as far as feasible from vibration-sensitive receptors. – Use smaller equipment to minimize vibration levels below the limits. – Avoid using vibratory rollers and tampers near sensitive areas. – Select demolition methods not involving impact tools. • If the above reduction measures do not lower anticipated vibration levels below loaded truck levels or are not feasible, a technical vibration study would be prepared by a qualified professional who verifies that there would be virtually no risk of cosmetic or structural damage. • Based on the results of vibration study, identify where vibration monitoring would be conducted, establish a vibration monitoring schedule, define structure-specific vibration limits, and address the need to conduct photo, elevation, and crack surveys to document before and after construction conditions. • Construction contingencies would be identified for when vibration levels approach the limits identified by vibration study. Construction contingencies may include procedures such as use of alternative construction equipment or construction phasing that would reduce potential damage to affected structures. • Designate a person responsible for registering and investigating claims of excessive vibration. The contact information of such person would be clearly posted at the construction site. • The results of all vibration monitoring would be summarized and submitted in a report shortly after substantial completion of construction that occurs within 25 feet of vibration-sensitive structures. The report would include a description of measurement methods, equipment used, calibration certificates, and graphics as required to clearly identify vibration-monitoring locations. An explanation of all events that exceeded vibration limits would be included together with documentation supporting any such claims.			
Recreation	**APM REC-1: Trail Management Plan** LSPGC shall coordinate with the City of San José, Santa Clara County, and the National Park Service for the preparation of the Project's TMP. The TMP shall identify if a detour route(s) is required, as well as provide trail-specific traffic control and safety measures for pedestrians, trail users, and motorists.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to and during construction
Recreation	**APM REC-2: Trail Safety Crossing Measures** If Coyote Creek Trail from Metcalf Road to Bailey Avenue is not already closed by Santa Clara County Parks due to flooding of low water trail crossings of Coyote Creek, LSPGC's construction contractor shall provide a crossing guard, as needed during periods of active construction along the approximately 0.8-mile portion of Coyote Creek Trail that would be directly impacted by construction of the Project. Alternatively, if use of a crossing guard is not practical during certain construction activities (i.e., a trail closure is required), the Coyote Creek Trail detour route identified in the TMP shall be implemented. Signage and flagging may be used to help direct trail users and provide safety for both trail users and construction crews.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	During construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Recreation	**APM REC-3: Trail Restoration** Areas of Coyote Creek Trail that are temporarily disturbed by the Project activities shall be restored to approximate preconstruction conditions.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	After construction
Traffic and Transportation	**APM TRA-1: Traffic Control Plan** LSPGC shall prepare a TCP to describe measures to guide traffic (such as signs and workers directing traffic), safeguard construction workers, provide safe passage, and minimize traffic impacts. LSPGC shall follow its standard safety practices, including installing appropriate barriers between work zones and transportation facilities, posting adequate signs, and using proper construction techniques. LSPGC shall follow the recommendations regarding basic standards for the safe movement of traffic on highways and streets in accordance with Section 21400 of the California Vehicle Code. As required for obtaining a local encroachment permit, LSPGC shall provide a TCP to the applicable local jurisdictions which shall comply with the U.S. Department of Transportation's (DOT) Manual on Uniform Traffic Control Devices (MUTCD). Construction activities shall be coordinated with local law enforcement and fire protection agencies, as required. Emergency service providers shall be notified, as required by the local permit, of the timing, location, and duration of construction activities.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to and during construction
Traffic and Transportation	**APM TRA-2: Coordinate Bus Stop Closures with Santa Clara VTA** If required during construction, LSPGC shall coordinate any bus stop closures with the Santa Clara VTA in advance to minimize disruptions to service. Where disruptions to service are anticipated, advanced notice shall be given to allow transit users on affected 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 website. Identification and implementation of specific measures shall be implemented in coordination with Santa Clara VTA.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to confirm compliance	During construction
Traffic and Transportation	**APM TRA-3: Repair Infrastructure** LSPGC shall oversee all aspects of construction and shall ensure that contractors repair any damage caused by construction activities. LSPGC shall confer with local agencies as needed to ensure repairs are sufficient and consistent with preconstruction conditions.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Within 30 Days following repair and prior to Project close out
Tribal Cultural Resources	**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;	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to and during all Project activities

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	• 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.			
Tribal Cultural Resources	**APM TCR-2: Cultural Resources Monitoring** Native American and archaeological 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 Muwekma Ohlone Indian Tribe of the San Francisco Bay Area, the Ohlone Indian Tribe, the Tamien Nation, and the Amah Mutsun Tribal Band 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.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to confirm compliance	Prior to and during all Project activities
Utilities	**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 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.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to and during all Project activities

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
PG&E Construction Measures				
Air Quality	**PG&E BMP AQ-1: Vehicle Idling** A vehicle operator is prohibited from idling an on-road diesel-fueled vehicle with a Gross Vehicle Weight of ≥10,001 pounds (lbs), or an off-road diesel-fueled vehicle with a primary engine ≥25 horsepower (hp), in excess of five minutes unless conducting one or more of the following activities: • Doing work for which the vehicle was intended; • Powering equipment necessary to perform a job function; • Operating lights or signals to direct traffic at a PG&E job site; • Service, testing or maintenance on the vehicle; • Regenerating an exhaust filter; • Idling for safety reasons, including providing light when working after dark, defrosting windows, keeping the cabin warm to avoid a health hazard, and providing air conditioning to avoid heat illness; • Idling due to traffic conditions beyond the vehicle operator's control; • Warming an engine up to operating temperatures, as specified by the equipment manufacturer; • Queuing, such as when a line of off-road trucks forms to receive materials from an excavator. Queuing does not include a vehicle waiting for another vehicle to perform a task. Idling while queuing is not allowed within 100 feet of a residential home.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
Air Quality	**PG&E BMP AQ-2: Asbestos** Because Metcalf substation is located in an area with known encounters of Naturally Occurring Asbestos (NOA), PG&E shall follow PG&E's Utility Procedure: ENV-1002P-02 for construction and grading activities at Metcalf substation to ensure compliance with applicable State of California regulations including the Asbestos Airborne Toxic Control Measure (AATCM). PG&E is responsible for obtaining permits from the air district prior to start of work.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
Air Quality	**PG&E BMP AQ-3: Fugitive Dust – General** Field crews must limit fugitive dust from PG&E project work at all times. Types of work activities where water trucks or other dust abatement methods are typically required include: • Construction; • Demolition; • Excavation; • Trenching; • Grading; • Sand blasting; • and other earthmoving activities	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	Visible emissions of fugitive dust from PG&E project activities must be maintained within the project boundary. The crew shall abate dust by: • Applying water to disturbed areas and to storage stockpiles; • Covering and securing stockpiled soil at the end of each workday; • Applying water in sufficient quantities to prevent dust plumes during activities such as clearing & grubbing, backfilling, trenching and other earth moving activities; • Limit vehicle speed to 15 miles per hour within approved unpaved work areas and along unpaved roads; • Vehicles and equipment used to transport bulk materials must be wetted, covered, and provide at least 6 inches of free board (space between top of truck and load) during transport; • Clean-up track-out at least daily; • Escalate preventative measures as needed to match conditions • Consider postponing construction activities during high wind events; and • The crew shall not generate dust in amounts that create a nuisance to wildlife or people, particularly where sensitive receptors such as neighborhoods, schools, and hospitals are located nearby or down-wind. During inactive periods (e.g. after normal working hours, weekends, and holidays), the crew shall apply water or other approved material to form a visible crust on the soil and restrict vehicle access.			
Air Quality	**PG&E BMP AQ-4: Portable Equipment Registration Program** PG&E requires that portable engines be registered into the Statewide Portable Equipment Registration Program (PERP) administered by the California Air Resources Board (CARB), if: • the engine is portable (mounted on a truck, trailer, skids, or wheels); • the engine is 50 brake horsepower or greater, and; • the engine does not provide motive force for a vehicle. Auxiliary engines mounted on vehicles need to be registered if they are 50 brake horsepower or greater. For PG&E-owned units, PG&E Environmental Management Air Program is responsible for maintaining valid PERP registration with support from Transportation Services. For rental units, the rental vendor is responsible for the PERP registration and to provide PG&E with a copy of the current registration, permit, and placard before use. *Standard Requirements:* • If a current placard, registration sticker, and registration paperwork is not on the unit, the crew shall NOT use the piece of equipment and have it replaced with a unit that is compliant. • For Rental Units: residence time onsite must be logged upon arrival onsite and upon removal. This record shall be retained and made available for review by the project Environmental Field Specialist (EFS).	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	Additional Requirements: • If a current placard, registration sticker, and registration paperwork is not on the unit, the crew shall NOT use the piece of equipment and have it replaced with a unit that is compliant. • If the PERP unit is being used to provide primary or supplemental power to a building during an electrical upgrade there is a 90-day limit on the use of PERP. • If the PERP unit is being used to provide primary or supplemental power to a building for greater than 12 months and an electrical upgrade is not happening a local air district permit is required. • If the PERP generator is being used for PSPS support in the following air districts a local air district permit will be required: – Bay Area Air Quality Management District (AQMD) – Placer County AQMD – Yolo-Solano AQMD – Northern Sonoma AQMD – San Joaquin Valley APCD – Feather River AQMD • If the PERP generator is being used for EPSS support in the following air districts a local air district permit may be required: – Monterey Bay ARD – Feather River AQMD • If the PERP Unit is being used to replace a failed stationary source generator: – a local district notification is required within 72 hours; – a Tier 4 Final Engine should be used; – and a local district permit may be required in 180 days. – If the PERP unit is being used for Capacity Shortfall in Feather River AQMD or Yolo-Solano AQMD, a local air district permit is required. *Greenhouse Gas (GHG) Facility Requirements*: If diesel portable engines greater than 50 brake horsepower (bhp) are operated onsite at a GHG facility subject to the Mandatory Reporting Rule for GHGs (MRR) at any time, the AB617 PERP Log must be completed.			
Air Quality	**PG&E BMP AQ-5: Tier 4 Construction Equipment** At least 75 percent of construction equipment with a rating between 100 and 750 hp shall be required to use engines compliant with Environmental Protection Agency (EPA) Tier 4 non-road engine standards. In the event enough Tier 4 equipment are not available to meet the 75 percent threshold, documentation of the unavailability shall be provided and engines utilizing a lower standard shall be used.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources	**PG&E FP-1 Worker Training:** Hold annual training on HCP requirements for employees and contractors performing covered activities in the Plan Area that are applicable to their job duties and work.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	Prior to and during construction
Biological Resources	**PG&E FP-2 Park Outside Sensitive Areas:** Park vehicles and equipment on pavement, existing roads, or other disturbed or designated areas (barren, gravel, compacted dirt).	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
Biological Resources	**PG&E FP-3 Use Existing Access Roads:** Use existing access and ROW roads. Minimize the development of new access and ROW roads, including clearing and blading for temporary vehicle access in areas of natural vegetation.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
Biological Resources	**PG&E FP-4 Minimize Impacts on Biological Resources:** Locate off-road access routes and work sites to minimize impacts on plants, shrubs, trees, small mammal burrows, and unique natural features (e.g., rock outcrops).	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
Biological Resources	**PG&E FP-5 Neighboring Landowner Notification** Notify conservation landowner at least two business days prior to conducting covered activities on protected lands (state and federally owned wildlife areas, ecological reserves, or conservation areas); more notice shall be provided if possible or if required by other permits. If the work is an emergency, as defined in PG&E's Utility Procedure ENV-8003P-01, PG&E shall notify the conservation landowner within 48 hours after initiating emergency work. While this notification is intended only to inform conservation landowner, PG&E shall attempt to work with the conservation landowner to address landowner concerns.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	Prior to and during construction
Biological Resources	**PG&E FP-6 Inspect Pipes and Culverts for Species:** Minimize potential for covered species to seek refuge or shelter in pipes and culverts. Inspect pipes and culverts, with a diameter wide enough to be entered by a covered species that could inhabit the area where pipes are stored, for wildlife species prior to moving pipes and culverts. Immediately contact a biologist if a covered species is suspected or discovered.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	Prior to and during construction
Biological Resources	**PG&E FP-7 15 mph Speed Limit:** Vehicle speeds on unpaved roads shall not exceed 15 mph.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
Biological Resources	**PG&E FP-8 No Fires, Litter, or Pets:** Prohibit trash dumping, firearms, open fires (such as barbecues), hunting, and pets (except for safety in remote locations) at work sites.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
Biological Resources	**PG&E FP-9 Spark Arrestors** During fire season in designated State Responsibility Areas, equip all motorized equipment with federally approved or state-approved spark arrestors. Use a backpack pump filled with water and a shovel and fire-resistant mats and/or windscreens when welding. During fire "red flag" conditions as determined by Cal Fire, curtail welding. Each fuel truck will carry a large fire extinguisher with a minimum rating of 40 B:C. Clear parking and storage areas of all flammable materials.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	Prior to and during construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources	**PG&E FP-10 Minimize Activity Footprint and Time Spent at a Work Location:** Minimize the activity footprint and minimize the amount of time spent at a work location to reduce the potential for take of species.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	Prior to and during construction
Biological Resources	**PG&E FP-11 Erosion and Sediment Control BMPs:** Utilize standard erosion and sediment control BMPs (pursuant to the most current version of PG&E's Stormwater Field Manual for Construction Best Management Practices) to prevent construction site runoff into waterways.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	Prior to and during construction
Biological Resources	**PG&E FP-12 Contain and Cover Stockpile Soil:** Stockpile soil within established work area boundaries and locate stockpiles so as not to enter water bodies, stormwater inlets, or other standing bodies of water. Cover stockpiled soil prior to precipitation events.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
Biological Resources	**PG&E FP-13 Wildlife Ramps:** Fit open trenches or steep-walled holes with escape ramps of plywood boards or sloped earthen ramps at each end if left open overnight. Field crews shall search open trenches or steep-walled holes every morning prior to initiating daily activities to ensure wildlife are not trapped. If any wildlife is found, a biologist shall be notified and shall relocate the species to adjacent habitat or the species shall be allowed to naturally disperse, as determined by a biologist.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
Biological Resources	**PG&E FP-14 Revegetate with "Weed Free" Seed Mix:** If the covered activity disturbs 0.1 acre or more of habitat for a covered species in grasslands, the field crew shall revegetate the area with a commercial "weed free" seed mix.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
Biological Resources	**PG&E FP-15 Refueling Buffers:** Prohibit vehicular and equipment refueling 250 feet from the edge of vernal pools, and 100 feet from the edge of other wetlands, streams, or waterways. If refueling must be conducted closer to wetlands, construct a secondary containment area subject to review by an environmental field specialist (EFS) and/or biologist. Maintain spill prevention and cleanup equipment in refueling areas.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
Biological Resources	**PG&E FP-16 Sensitive Area Buffers:** Maintain a buffer of 250 feet from the edge of vernal pools and 50 feet from the edge of wetlands, ponds, or riparian areas. If maintaining the buffer is not possible because the areas are either in or adjacent to facilities, the field crew shall implement other measures as prescribed by the land planner, biologist, or HCP administrator to minimize impacts by flagging access, requiring foot access, restricting work until dry season, or requiring a biological monitor during the activity.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources	**PG&E FP-17 Fell Trees Away from Exclusion Zones** Directionally fell trees away from an exclusion zone, if an exclusion zone has been defined. If this is not possible, remove the tree in sections. Avoid damage to adjacent trees to the extent possible. Avoid removal of snags and conifers with basal hollows, crown deformities, and/or limbs over 6 inches in diameter.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
Biological Resources	**PG&E FP-18 Bird Nests with Eggs** Nests with eggs and/or chicks shall be avoided; contact a biologist, land planner, or the Avian Protection Program manager for further guidance.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
Biological Resources	**PG&E BMP BIO-1: Worker Environmental Awareness Training** A qualified biologist will develop an environmental awareness training program that is specific to the project. All on-site construction personnel will attend the training before they begin work on the project. Training will include a discussion of the construction management practices that are being implemented to protect biological resources as well as the terms and conditions of any project permits.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	Prior to and during construction
Biological Resources	**PG&E BMP BIO-2: Burrowing Owl** A survey for evidence of burrowing owl (sign or presence) shall be conducted prior to initial ground disturbance. The survey shall occur within the best detection timeframe and within two weeks of construction. If burrowing owl are detected, consult with the CDFW.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	Prior to construction
Biological Resources	**PG&E BMP BIO-3: Nesting Birds** If work is anticipated to occur within the nesting bird season (February through August), nesting birds, including raptors and other species protected under the MBTA, may be impacted. If active nests are discovered, exclusionary measures and/or designated avoidance buffers may be required and implemented according to the guidance in the PG&E Nesting Bird Management Plan. The Project biologist determines if the construction action will impact the nest, and if so, identifies whether alternative actions or monitoring can be implemented to avoid impacts. If active nests are observed during construction, crews must immediately alert the PG&E Project biologist.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	Prior to and during construction
Cultural Resources	**PG&E BMP CULT-1: Worker Awareness Training** PG&E will provide environmental awareness training on archeological cultural and paleontological resources protection. This training may be administered by the PG&E cultural resources specialist (CRS) or a designee as a stand-alone training or included as part of the overall environmental awareness training as required by the project and will at minimum include: types of cultural resources or fossils that could occur at the project site; types of soils or lithologies in which the cultural resources or fossils could be preserved; procedures that should be followed in the event of a cultural resource, human remain, or fossil discovery; and penalties for disturbing cultural or paleontological resources.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	Prior to and during construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Cultural Resources	**PG&E BMP CULT-2: Archaeological and Native American Monitoring** Archaeological and Native American monitoring shall occur for all project-related ground disturbance affiliated with work at or adjacent to San Jose B Substation and Metcalf Substation. PG&E will retain a qualified archaeologist and Native American monitor for all ground disturbing activities completed by PG&E. The archaeological and Native American monitor will closely inspect all exposed surfaces and sediments for cultural resources in result of construction activities and have stop work authority if a cultural resource is identified. Furthermore, the CRM and Native American monitor/representative will work with construction crews in systematically redirecting ground disturbing activities until the CRS and Native American monitor/representative can investigate the cultural resource discovery.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
Cultural Resources	**PG&E BMP CULT-3: Inadvertent Discovery** If any new cultural resources are encountered during Project activities, all work must be suspended in the vicinity (approximately 100 feet) of the resource, and the cultural resource specialist (CRS) shall be immediately notified. At that time, the CRS shall coordinate any necessary investigations of the site with appropriate specialists, as needed. PG&E may be required to implement protective measures deemed necessary for the protection of the cultural resources. Prehistoric resources that may be identified during Project implementation may include, but are not limited to, stone tools and manufacturing debris made of obsidian, basalt, and other lithic materials; milling equipment such as bedrock mortars, portable mortars, and pestles; and locally darkened soils (midden) that may contain dietary remains such as shell and bone, as well as human remains. Historic resources that may be identified include, but are not limited to, small cemeteries or burial plots, structural foundations, cabin pads, cans with soldered seams or tops, bottles or fragments of clear and colored glass, cut (square) nails, and ceramics.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
Cultural Resources	**PG&E BMP CULT-4: Flag and Avoid Known Resources** Sites will be marked with flagging tape, safety fencing, and/or sign designating it as an “environmentally sensitive area” to ensure that PG&E construction crews and heavy equipment will not intrude on these sites during construction. At the discretion of the PG&E CRS, monitoring may be done in lieu of or in addition to flagging. If it is determined that the project cannot avoid impacts on one or more of the sites, then, for those sites that have not been previously evaluated, evaluation for inclusion in the National Register of Historic Places (NRHP)/California Register of Historic Resources (CRHR) will be conducted. Should the site be found eligible, appropriate measures to reduce the impact to a less-than-significant level will be implemented, including, but not limited to, data recovery, photographic and archival documentation, or other measures as deemed appropriate. If it is determined that sites that have been previously determined to be eligible for inclusion in either the NRHP or CRHR cannot be avoided, measures will be implemented to reduce the impact to a less-than-significant level, including, but not limited to, data recovery, photographic and archival documentation, or other measures as deemed appropriate.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Cultural Resources	**PG&E BMP CULT-5: Human Remains** In keeping with the provisions provided in 7050.5 of the CHSC and Public Resource Code 5097.98, if human remains are encountered (or are suspected) during any project-related activity, PG&E shall: • Stop all work within 100 ft.; • Immediately contact: CRS, who will then notify the county coroner; • Secure location, but do not touch or remove remains and associated artifacts; • Do not remove associated spoils or pick through them; • Record the location and keep notes of all calls and events; and • Treat the find as confidential and do not publicly disclose the location. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission within 24 hours of such identification. The most likely descendant shall work with the CRS to develop a program for re-interment or other disposition of the human remains and any associated artifacts. No additional work shall take place within the immediate vicinity of the find until the appropriate actions have been implemented.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
Geology, Soils, and Paleontological Resources	**PG&E BMP PALEO-1**: **Unanticipated Paleontological Discoveries** If significant paleontological resources are discovered during construction activities, work will stop within 50 feet and the PG&E CRS will be contacted immediately. The CRS will work with the qualified paleontologist to evaluate the discovery. If the discovery is determined to be significant, PG&E will implement measures to protect and document the paleontological resource. Work may not resume within 50 feet of the find until approval by the CRS in coordination with the paleontologist. In the event that significant paleontological resources are encountered during the project, protection and recovery (if feasible and safe) of those resources may be required. Treatment and curation of fossils will be conducted in consultation with the landowner, PG&E, and CPUC. The paleontologist will be responsible for developing the recovery strategy and will lead the recovery effort, which will include establishing recovery standards, preparing specimens for identification and preservation, documentation and reporting, and securing a curation agreement from the approved facility.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
Hazards, Hazardous Materials, and Public Safety	**PG&E BMP HAZ-1: Oil-Filled Electrical Equipment (OFEE)** The following measures shall be followed: • OFEE shall be managed in accordance with ENV-3000P-02-JA01 Job Aid: Handling In-Service Electrical Equipment from the Field. • If during the removal/replacement of OFEE, visible evidence of an oil leak is identified (e.g., seeping, weeping, staining, sheen), contact your local EFS immediately to determine cleanup actions and regulatory reporting requirements. • Work must cease on all leaking pre-July 1, 1979 equipment or equipment without a non-poly-chlorinated biphenyls (PCB) blue sticker or other non-PCB indicator on its nameplate until you've made contact with your local EFS.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	• All leaking equipment must be patched, pumped, or containerized in the field so that it shall not leak during transport; taken straight back to the Service Center (i.e., stops at staging areas are prohibited); and placed in the designated returned equipment area with a completed yellow condition tag. • Other equipment and bushings that cannot be tested and shall be assumed > 500 ppm PCB. Contact the EFS to coordinate generation of a purchase order and contract for disposal. This equipment shall be transported by a PG&E-approved hazardous waste contractor and taken to a disposal facility. **Note**: Do NOT transport to a PG&E waste consolidation site.			
Hazards, Hazardous Materials, and Public Safety	**PG&E BMP HAZ-2: Hazardous Materials Business Plan (HMBP)** The EFS shall be notified 30 days prior to a threshold exceeding hazardous material/waste being placed on-site. Threshold limits are 200 cubic feet of compressed gases (1,000 cubic feet for simple asphyxiation or the release of pressure only; carbon dioxide), 500 lbs of solids, or 55 gallons of liquids for more than 30 non-consecutive days. If required, the local county or city shall be notified of any amount of hazardous material/waste: • Counties: Nevada, San Bernardino (waste only), San Francisco, Santa Clara (call for city specific details), Santa Cruz, Yuba (waste only) • Cities: Bakersfield (waste only), Berkeley, Healdsburg, Sebastopol, Petaluma, Santa Clara (call for city specific details) • PG&E shall develop an HMBP as necessary.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
Hazards, Hazardous Materials, and Public Safety	**PG&E BMP HAZ-3: Hazardous Waste Management** This Project may involve the storage of hazardous materials, and they must be managed according to regulations and the following BMPs. • All releases of hazardous materials must be immediately addressed. Maintain a spill kit on-site during the length of the Project. Contact the Project EFS for spills of hazardous materials/wastes to determine if agency notifications shall be required and/or if additional resources are needed. • Hazardous materials, greater than 440 lbs and less than 1,001 lbs can be transported on PG&E vehicles if the proper materials of trade (MOT) shipping paper/Material Safety Data Sheet (MSDS) accompanies the load. Contact the Project EFS for additional guidance in these areas. • All hazardous materials containers must be marked correctly. • All hazardous materials signs must be displayed as required. • Non-saturated oily rags (to be laundered) stored in non-combustible containers. • Emergency equipment such as fire extinguisher, eye wash, MSDS, etc. must be available on-site. • Hazardous material containers must be in good condition. • All hazardous materials must be compatible with containers. • Hazardous materials containers are kept closed.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	• If there is an unauthorized release of hazardous material, contact your EFS immediately. For after-hours releases contact the Environmental Emergency Hotline at 1-800-874-4043. Immediately contact the local PG&E EFS and stop work if any of the following conditions occur. After hours or if the local EFS is unavailable, please call the Environmental Hotline at 800-874-4043. • Discharge or spill of hazardous substance. • If an Environmental Regulator visits the site. • Visually cloudy/muddy water is observed leaving the work area; • An underground storage tank is discovered. • A subsurface component related to site remediation activities (e.g., monitoring well, recovery well, injection well) is discovered. No subsurface components may be impacted. • If during excavation unanticipated evidence of contamination is identified (e.g., staining, odors), work must cease and when safe to do so, cover the trench with steel plates. In order to minimize impacts to public safety and the environment, place contaminated soil on a polyethylene sheet (four milliliters) and cover or place the contaminated soil in lined covered containers. Then contact your local/support EFS to determine the next steps. • If any subsurface components related to site remediation activities (e.g., monitoring well, recovery well, injection well) are discovered in the path of excavation, work must cease in that location and your EFS must be notified to determine the next steps. No subsurface components may be impacted.			
Hazards, Hazardous Materials, and Public Safety	**PG&E BMP HAZ-4: Lead Acid Batteries** This Project shall be generating lead-acid battery universal waste. The construction contractor or PG&E technicians shall properly manage and dispose of universal waste and follow Lead Acid Battery Procedure ENV 4000P-05-JA05 and/or ENV 4000P-05- JA06. Contact the Project EFS for additional guidance in these areas. *Management of Undamaged (Intact) Batteries – Universal Waste*: • If batteries are undamaged (i.e., intact and not leaking), they can be managed as universal waste at the nearest PG&E waste consolidation site. Remote sites shall have batteries transported and disposed of from site if quantities warrant. A PG&E-approved hazardous waste contractor transports intact batteries from a waste consolidation site to an approved universal waste handler using a non-hazardous waste manifest. • Note: It is recommended that large station backup batteries are better shipped directly from the substation to a disposal facility rather than taken to a PG&E waste consolidation site. Coordinate with the local EFS for disposal. • Reference ENV 4000P-05-JA05 for general information, proper labeling, transportation, storage, and accumulation time limit. *Management of Damaged or Leaking Batteries – Hazardous Waste*: • Ship damaged or leaking batteries from a waste consolidation site to an approved treatment, storage, and disposal facility (TSDF) for disposal using a PG&E-approved hazardous waste contractor and a uniform hazardous waste manifest (see ENV-4000P-02-JA01 Uniform Hazardous Waste Manifest).	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	• Batteries must be placed in non-reactive, structurally sound, closed containers (such as plastic drum) that are adequate to prevent breakage or further damage and contain vermiculite, which can be attained at a PG&E waste consolidation site. • Reference ENV 4000P-05-JA05 for general information, proper labeling, transportation, storage, and accumulation time limit. Transportation – Reference ENV 4000P-05-JA05. • Transporting > 10 lbs of non-spillable batteries per vehicle from a field location to a consolidation facility requires a shipping paper (see Utility Procedure: ENV-4000P-05, Hazardous Waste Shipping Paper). Contact EFS if there is a large quantity of batteries for waste to determine handling and whether to ship from site to recycler. • Transporting ≤ 10 lbs of intact batteries per vehicle does not require a shipping paper. However, document the shipment in the log maintained in the consolidation site's waste storage area. Disposal – Reference ENV 4000P-05-JA06.			
Hazards, Hazardous Materials, and Public Safety	**PG&E BMP HAZ-5: Lead Paint Removal** For any physical removal, sanding, scraping, needle gunning, blasting, or welding, contact the local Safety Specialist or Paintings and Coating Department. For PG&E Contractor lead paint removal, the Contractor shall adhere to the Contract for worker health and safety. If the Project team has safety concerns prior to or during the Project, immediately contact the Safety Program Consultant.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
Hazards, Hazardous Materials, and Public Safety	**PG&E BMP HAZ-6: Sulfur Hexafluoride (SF_6) Gas Material/Waste Management** Advanced Specialty Gas (ASG) provides sole-source service in supplying, replacing, removal and recycling of SF6 in all facilities. ASG provides 24-hour service in response to events involving SF6 as well as delivery and removal of all SF6 cylinders. • Contact information: https://www.advancedspecialtygases.com. Before accessing any equipment that may contain SF6 gas byproduct waste, contact the local EFS at least two weeks in advance for assistance in arranging cleanup, transportation, and disposal. • PSC shall retrieve, package, label, and transport SF6 byproduct waste (i.e., fluorides of sulfur, metallic fluorides, etc.). All SF6 byproduct waste that is removed must have proper shipping papers, which could include a remote waste shipping paper or a manifest (manifests require a permanent or temporary EPA identification number). • SF6 cylinder tracking and facility inventory shall be managed in accordance with Utility Procedure TD-3350P-001.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Hazards, Hazardous Materials, and Public Safety	**PG&E BMP HAZ-7: Spill Prevention, Control, and Countermeasure (SPCC) Plan** The local/support EFS shall be notified 30 days prior to an SPCC-triggering event occurs. Events that trigger an SPCCP include: • New storage of oil at a facility causing the total oil storage to exceed 1,320 gallons. • Modification to existing oil storage at a facility that contains >1,320 gallons of oil by addition or removal of oil containers >55 gallons. If the oil volume is contained in anything greater than 55 gallons, the SPCC Plan must be certified by a licensed engineer. SPCC containment must be installed prior to moving on-site of oil quantities requiring containment. The PM number must remain open until the local/support EFS notifies the team that the plan is certified by an engineer, and any necessary modifications are complete.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	Prior to and during construction
Hazards, Hazardous Materials, and Public Safety	**PG&E BMP HAZ-8: Underground Electric Cable** Underground electric cable might require special handling and disposal as the cable may potentially be wrapped in lead or asbestos containing material, contain asbestos insulation, and/or oil for insulation. Furthermore, insulating oil used in underground cable may contain PCBs. If evidence of these hazardous materials is identified during the cable replacement, such as weeping oil from the cut end of the cable, the local EFS shall be contacted immediately to arrange for sampling, and to determine transportation and disposal requirements. A PG&E authorized hazardous waste hauler may be required to transport the cable. Arc-proofing wrap that is both friable (brittle, crisp or fragile) and non-friable must be removed by a certified abatement vendor or trained PG&E personnel (PG&E Insulation & Coatings, PSC, Bohm, ACS).	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
Hazards, Hazardous Materials, and Public Safety	**PG&E BMP HAZ-9: Vault Dewatering** Vault dewatering may be required. All vault dewatering must take place in accordance with the Vault Dewatering form.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
Hazards, Hazardous Materials, and Public Safety	**PG&E BMP HAZ-10: Stormwater BMP Installation** This Project shall require an SWPPP. If the construction crew shall not be installing stormwater BMPs, it is the responsibility of the Project manager to contact the Stormwater Quality Subject Matter Expert (SME) and Environmental Lead prior to construction to request BMP support with as much lead time as possible. Thirty days is preferred. The regional Stormwater SME shall hire a contractor to install, maintain, and remove stormwater BMPs.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	Prior to and during construction
Hazards, Hazardous Materials, and Public Safety	**PG&E BMP HAZ-11: Construction Dewatering** If dewatering of trenches or excavations is required, the Environmental Lead/Project EFS shall be notified at least 30 days in advance to ensure the appropriate dewatering methods are used, proper notifications are made, and, if necessary, applicable authorizations/permits are obtained. All dewatering activities must be coordinated through the Environmental Lead/Project EFS throughout the duration of the Project.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	Prior to and during construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Hazards, Hazardous Materials, and Public Safety	**PG&E BMP HAZ-12: Skyline Terminal Site SMP** PG&E construction activities that occur on the proposed Skyline terminal property will comply with the Site Management Plan (SMP) that was prepared as part of the Covenant for the property.	PG&E and its contractors to implement measure as defined	PG&E submit compliance report to CPUC	During construction
CEQA Mitigation Measures				
Aesthetics	**LSPGC Mitigation Measure 3.1-2: Minimize Fugitive Light from Temporary Sources Used for Construction** The use of outdoor lighting shall be minimized during construction, operation, and maintenance. Photocell and motion detection-controlled lighting shall be provided, to the maximum extent feasible, 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.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	During construction
Air Quality	**LSPGC Mitigation Measure 3.3-2a: Construction Fleet Minimum Requirements and Tracking – LSPGC 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 for all construction locations except the Grove and Skyline HVDC terminals. LSPGC shall ensure that 100 percent of all off-road construction equipment used at the terminal sites is Tier 4 Final compliant. An initial listing that identifies each off-road unit's certified tier specification to be operated for the Project shall be submitted to the CPUC for review and approval before the start of construction activities. Construction activities shall not begin until the equipment listing has been submitted to and approved by the CPUC. As LSPGC requires new or replacement construction equipment on the Project, LSPGC shall document verification of the certified engine tier and provide such documentation to CPUC as a component of the tracking tool to be submitted on a monthly basis. Before the start of construction, LSPGC shall develop an off-road construction equipment-use hours tracking tool and procedure. Construction activities shall not begin until the tracking tool and procedure have been submitted to and approved by the CPUC. 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 off-road construction 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 monthly to track the Project's compliance. The updated tracking tool shall be submitted to the CPUC no later than the 10th day of the following month.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Air Quality	**PG&E Mitigation Measure 3.3-2b: Construction Fleet Minimum Requirements and Tracking – PG&E Tier 4 Final Emissions Controls** PG&E shall ensure that all off-road construction equipment used to complete the San José B Substation expansion and the Metcalf Substation modification includes Tier 4 Final emissions controls. PG&E shall document verification of the certified engine tier and provide such documentation to the CPUC upon request.	PG&E and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Air Quality	**LSPGC Mitigation Measure 3.3-2c: Use Best Management Practices for Construction-Related Fugitive Dust Emissions** LSPGC shall implement all of the following best management practices, which would reduce fugitive PM_{10} and $PM_{2.5}$ emissions: • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day unless exposed surfaces are saturated from a rain event. • 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 shall be suspended when average wind speeds exceed 20 mph. • All trucks and equipment, including their tires, shall be washed off prior to leaving an unpaved site. • Unpaved roads providing access to sites located 100 feet or farther from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel. • Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints at all active construction sites. This person shall respond and take corrective action within 48 hours of receiving a complaint. BAAQMD'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 construction at the terminal sites and staging areas. 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 and water 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. • Hydroseed or apply non-toxic soil stabilizers to construction areas, including previously graded areas, that are inactive for at least 10 calendar days.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Air Quality	**PG&E Mitigation Measure 3.3-2d: Use Best Management Practices for Construction-Related Fugitive Dust Emissions** PG&E shall implement the following best management practices, as needed to ensure that visible fugitive dust emissions do not cross property lines, thereby reducing fugitive PM_{10} and $PM_{2.5}$ emissions: • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. • 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 once mobilization begins. 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 shall be suspended when average wind speeds exceed 20 mph. • When working outside of paved or developed areas, all trucks and equipment, including their tires, shall be washed off prior to leaving the site as needed to prevent off-site tracking. • Unpaved roads providing access to sites located 100 feet or farther from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel. • Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours	PG&E and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Biological Resources	**LSPGC Mitigation Measure 3.4-1: 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 in early, mid-, or late spring, in conjunction with the blooming seasons of all rare plants with potential to occur in the survey area. If no special-status plants are observed during appropriately timed surveys conducted 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 the project manager shall be notified so that potential impacts on these known occurrences will be avoided or minimized. Coordination with CDFW and/or USFWS staff shall be conducted to establish appropriate avoidance and minimization measures if the species is federally or State listed. Avoidance and minimization measures may include: (1) No-disturbance buffers. The size of the buffer would typically be 25–50 feet but may be increased or decreased by the biologist depending on the plant species and surroundings.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	(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.			
Biological Resources	**LSPGC Mitigation Measure 3.4-2: Protection of Special-status Wildlife** To supplement the protective actions provided in the APMs and PG&E BMPs and FPs for special-status wildlife species, including, but not limited to, terrestrial mammals, reptiles and amphibians, and roosting bats, this measure includes specific criteria regarding preconstruction survey timing, buffer demarcation, and steps to follow in the event a special-status species is found. Preconstruction clearance surveys within suitable habitat for special-status species that are known to be present or have at least a moderate potential to occur shall be conducted by a qualified biologist within 7 days of the start of construction activities. Nesting bird surveys shall only be required between February 1 and August 31. If a special-status wildlife species or nesting birds are found, the qualified biologist shall clearly mark avoidance buffers for protection of biological resources using flagging or other high-visibility material. Avoidance buffers shall be 50 feet for songbirds and non-raptor nests and 500 feet for raptor nests and other large species; buffer sizes may be increased or decreased by the qualified biologist, depending on species and site location. USFWS and/or CDFW shall be notified in the event a federally listed or State-listed species is found. A qualified biologist shall 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. If a special-status species is observed in a work area, the qualified biologist shall clearly mark the area using flagging or other high-visibility material 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 is relocated by a qualified biologist in accordance with the Santa Clara Valley HCP or a species-specific ITP, in coordination with USFWS and/or CDFW. If relocation of the special-status species is not allowed, an avoidance buffer shall be established at 25 feet to 250 feet, depending on the species and location, and as USFWS and/or CDFW recommends. Protective actions under the Santa Clara Valley HCP or species-specific ITP may include seasonal avoidance of sensitive habitat areas, monitoring requirements and reporting, and mitigation for permanent loss of habitat.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources	**LSPGC Mitigation Measure 3.4-3: Compensatory Mitigation** Permanent loss of riparian acreage shall be mitigated in accordance with the specifications of applicable regulatory agency permits. These permits may include a U.S. Army Corps of Engineers Clean Water Act Section 404 permit, a Regional Water Quality Control Board Clean Water Act Section 401 permit, and/or a CDFW Section 1600 Lake and Streambed Alteration Agreement. Specific compensatory mitigation, if required, shall include replacement of like habitat on- or off-site, at a 1:1 ratio, or as otherwise specified by the applicable resource agency permit(s).	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to, during, and postconstruction
Biological Resources	**LSPGC Mitigation Measure 3.4-4: Habitat Restoration and Monitoring** Before construction in areas containing waters of the U.S. and/or State, the Applicant shall obtain all required environmental permits, including Clean Water Act water quality certification for federal and State jurisdictional wetlands (Section 401), permits for federal jurisdictional wetlands (Section 404), and CDFW Lake and Streambed Alteration Agreement (Section 1600). The Applicant shall adhere to the conditions of each permit. Before construction activities within waters of the U.S. and/or State conclude, the Applicant shall submit a restoration plan to CDFW for review and written approval. No restoration activities shall commence until the restoration plan has been approved by CDFW in writing. The plan shall detail compensation for permanent impacts on riparian and wetland habitat in the form of restoration or enhancement of habitat on-site, or off-site as close to the Project site as feasibly possible. The plan shall also describe the on-site restoration of temporary impacts on riparian and wetland habitat, as applicable, and shall include monitoring requirements and success criteria. The restoration plan shall be implemented within the same calendar year as the completion of Project activities unless otherwise approved in writing by CDFW. 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 the replanting of native vegetation removed before or during construction, and for 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 in the temporarily disturbed areas, all planting areas shall be monitored and maintained annually by a qualified biologist as necessary for 5 years. At the end of the 5 years of monitoring, with at least 3 years without supplemental irrigation, successful restoration of each category of plantings (e.g., herbs, shrubs) will include at least 85 percent survival at the end of the minimum monitoring period and plantings shall attain 70 percent relative cover after 3 years and 75 percent relative cover after 5 years, unless otherwise approved in writing by CDFW. Survival and cover criteria shall both be required, unless the herbaceous or spreading plants cannot be differentiated by individual, in which case only cover success criteria would be required.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to, during, and post construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources	**LSPGC Mitigation Measure 3.4-5: Compliance with Local Tree Ordinances** All removal of street trees within the jurisdictional limits of the City of San José and Santa Clara County shall be coordinated with the responsible department in each jurisdiction (see Section 3.4.3) to obtain any necessary ministerial tree removal permits. LSPGC shall comply with all permit conditions, including tree replanting and monitoring to ensure successful replanting. LSPGC shall provide copies of the approved permits from the applicable jurisdictions before the start of construction.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Cultural Resources	**LSPGC Mitigation Measure 3.5-1: Cultural Resources Management Plan (CRMP)** • The CPUC, LSPGC, consulting Native American representative(s), and a Secretary of the Interior–qualified archaeologist shall determine whether preservation in place of significant cultural resources 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 the parties determine that preservation in place is not feasible, data recovery through archaeological investigations shall be completed. • LSPGC shall retain a Secretary of the Interior–qualified archaeologist, in consultation with consulting Native American representative(s), to prepare and implement a Cultural Resources Management Plan (CRMP). The CRMP shall include a treatment program to define the research themes and data requirements, define treatment locations, and determine whether cultural materials can address the questions associated with research themes. The Secretary of the Interior–qualified archaeologist, in consultation with consulting Native American representative(s), shall conduct a data recovery program as outlined in the CRMP. The CRMP will include how the data recovery program would preserve the significant information the resource is expected to contain. Treatment would consist of (but would not be limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim of targeting the recovery of important data contained in the portion of the significant resource to be affected by the Project. The CRMP shall include provisions for analysis of data in a regional context; reporting of results within a timely manner and subject to review and comments by the consulting Native American representative(s); disposition of resources acceptable to the consulting Native American representative(s) and in accordance with all applicable laws; and dissemination of final confidential reports to the Northwest Information Center of the California Historical Resources Information System. • The LSPGC CRMP will also include a monitoring plan. The monitoring plan will include specifically where monitoring will be completed and under what circumstances based on soil types, geology, distance to known sites, and other factors; the person(s) responsible for conducting monitoring activities, including consulting Native American representative(s); how the monitoring shall 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 with the encountered resources (e.g., collection, identification, curation); and the methods to ensure security of cultural resources sites. During the course of the monitoring, the archaeologist and consulting Native American representative(s) may adjust the frequency—from continuous to intermittent—of the monitoring based on the conditions and professional judgment regarding the potential to impact resources, with approval of the CPUC.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to any Project-related ground disturbing activities and during construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	• The LSPGC CRMP will be submitted to the CPUC for approval prior to implementation as well as all subsequent reports, plans, and resource documentation resulting from implementation of the CRMP.			
Cultural Resources	**PG&E Mitigation Measure 3.5-1: Cultural Resources Treatment Plan (CRTP).** • CPUC, PG&E, consulting Native American representative(s), and a Secretary of the Interior–qualified archaeologist shall determine whether preservation in place of significant cultural resources is feasible. Consistent with CEQA Guidelines Section 15126.4(b)(3), this may be accomplished by 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 it is determined that preservation in place is not feasible, data recovery through archaeological investigations shall be completed. • PG&E shall retain a Secretary of the Interior–qualified archaeologist, in consultation with consulting Native American representative(s), to prepare and implement a Cultural Resources Treatment Plan (CRTP). The CRTP shall include a plan to treat all cultural materials identified during construction that are contributing constituents of historical resources. The purpose of the treatment program will be to identify the procedures to follow in the event that cultural materials associated with historical archaeological resources are identified, define the tribal engagement procedures, and identify a place for cultural resources to be safely stored, if needed, until they can be reburied or treated in accordance with the tribe(s) recommendations, if the materials are Native American, in accordance with all applicable laws. Treatment could consist of (but would not be limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim of targeting the recovery of important data contained in the portion of the significant resource to be affected by the Project. The methods of treatment would be determined in consultation with the consulting Native American representative(s). The CRTP shall include provisions for analysis of data in a regional context; reporting of results in a timely manner and subject to review and comments by the consulting Native American representative(s); disposition of resources acceptable to the consulting Native American representative(s); and dissemination of final confidential reports to the Northwest Information Center of the California Historical Resources Information System. • The CRTP will also include a monitoring plan. The monitoring plan will specifically identify: – the location(s) where monitoring will be completed based on soil types, geology, distance to known sites, and other factors; – the person(s) responsible for conducting monitoring activities, including consulting Native American representative(s); – the method for conducting the monitoring and the required format and content of monitoring reports; – the schedule for submittal of monitoring reports and person(s) responsible for review and approval of monitoring reports; – the protocol for notifications in case of encountering cultural resources, as well as methods of managing the encountered resources (e.g., collection, identification, curation, repatriation); – and the methods to ensure security of cultural resources sites.	PG&E and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to any Project-related ground disturbing activities and during construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	• During the course of the monitoring, the archaeologist and consulting Native American representative(s) may adjust the frequency of the monitoring from continuous to intermittent based on the conditions and professional judgment of the archaeologist and Native American representative(s) regarding the potential to affect cultural resources. • The PG&E CRTP for Metcalf Substation will be submitted to the CPUC for approval before implementation. Similarly, all subsequent reports, plans, and resource documentation resulting from implementation of the CRTP will be submitted to CPUC for approval upon request.			
Noise	**LSPGC Mitigation Measure 3.13-1a: Nighttime Construction Noise Plan** LSPGC and/or its contractors shall develop and implement a nighttime construction noise plan specific to each occurrence of nighttime construction activities proposed to occur within 500 feet of residences. For the purposes of implementation of this measure, "nighttime" means between the hours of 7:00 p.m. and 7:00 a.m. Each plan shall describe the proposed nighttime construction activities in detail and explain why such activities cannot be conducted during daytime hours and shall be submitted to CPUC for review and approval. CPUC approval must be granted before the start of the subject nighttime construction activities. A plan shall not be required for emergency situations where stopping construction activities would result in hazardous conditions for workers or the public. Each plan shall include but not be limited to the following requirements for nighttime construction activities: • The plan shall include documentation that approval from the applicable local jurisdiction (i.e., the City of San José or Santa Clara County) has been received to the extent applicable or required. • Activities shall be planned to minimize the amount of nighttime construction. • Impact tools (e.g., jackhammers, pavement breakers) and pile drivers shall be prohibited during nighttime hours. • When nighttime construction activities take place within 200 feet of noise-sensitive receptors, portable construction noise barriers, such as paneled noise shields, barriers, enclosures, or sound curtains, shall be used adjacent to or around loud stationary equipment. Noise control shields shall be made featuring a solid panel and a weather-protected, sound-absorptive material on the construction-activity side of the noise shield. • A notice shall be distributed by mail, personal visit, door hanger, or email to the potentially affected residences and other sensitive receptors within 200 feet of the nighttime construction activities, describing where and when nighttime construction activities will occur.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Before and during nighttime construction
Noise	**LSPGC Mitigation Measure 3.13-3: Vibration Monitoring for High Vibratory Equipment Contingency Plan** LSPGC and/or its construction contractors shall conduct a site survey along segments of the proposed transmission line alignments where trenchless construction techniques that involve vibratory or impact pile driving activities may occur within 50 feet of existing structures. If construction with high vibratory equipment (i.e. vibratory pile drivers or impact pile drivers) occurs within 50 feet of structures, a vibration monitoring for high-vibratory equipment contingency plan shall be implemented. The plan shall include the following measures, as necessary, to prevent vibration damage to vibration-sensitive structures:	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to and during construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	• LSPGC and/or its construction contractors shall identify vibration-sensitive structures within 50 feet of the final transmission line alignments where high vibratory equipment is planned to be used. • Where such structures are identified, LSPGC shall implement the following measures as necessary to avoid construction vibration impacts: – Place operating equipment on the construction site as far as feasible from vibration-sensitive receptors. – Use smaller equipment to minimize vibration levels below the limits. – Avoid using vibratory rollers and tampers near sensitive areas. – Select construction methods that do not involve impact/vibratory tools (e.g., drilling) where feasible. • If the above reduction measures do not lower anticipated vibration levels below loaded truck levels or are not feasible, a qualified professional shall prepare a technical vibration study that verifies that there would be no risk of cosmetic or structural damage. • Based on the results of the vibration study, LSPGC and/or its construction contractors shall identify where vibration monitoring is to be conducted; establish a vibration monitoring schedule; define structure-specific vibration limits; and address the need to conduct photo, elevation, and crack surveys to document before- and after-construction conditions. • Construction contingencies shall be identified for when vibration levels approach the limits identified by the vibration study. Construction contingencies may include procedures such as the use of alternative construction equipment or construction phasing that would reduce potential damage to affected structures. • LSPGC shall designate a person responsible for registering and investigating claims of excessive vibration. The contact information of such person shall be clearly posted at the construction site. • The results of all vibration monitoring shall be summarized and submitted in a report shortly after substantial completion of trenchless construction that involves vibratory or impact pile driving activity that occurs within 50 feet of structures. The report shall describe measurement methods and equipment used and include calibration certificates and graphics as required to clearly identify vibration-monitoring locations. An explanation of all events that exceeded vibration limits shall be included together with documentation supporting any such claims.			
Transportation	**LSPGC Mitigation Measure 3.17-1a: Implement Coordinated Traffic Control Plan** LSPGC shall coordinate with Project proponents, contractors, and local agencies, as applicable, for other construction projects in the Project vicinity that may temporally overlap with Project construction, such as projects identified as potentially contributing to cumulative effects. 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:	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to and during construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	• Coordination of individual traffic control plans for the Project with nearby projects. As available, the individual traffic controls plans shall be appended to the Project's traffic control plan. • Coordination between LSPGC, Project proponents, contractors, and State and local agencies, including court facilities, in developing circulation and detour plans that include safety features (e.g., signage and flaggers). The circulation and detour plans shall address the following: – Full and partial roadway closures. – 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 and in the proximity of court facilities. – 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 before the start of applicable construction activities.			
Transportation	**LSPGC Mitigation Measure 3.17-1b: Infrastructure Repair Reporting** Prior to the start of construction, LSPGC shall document existing conditions of all facilities that are potentially impacted by the project. After completion of the repair of any damaged roads, sidewalks, trails, and bicycle facilities resulting from Project construction activities, pursuant to APM TRA-3, 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.). This report will confirm that 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 after completion of the repair(s).	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Within 30 Days following repair and prior to Project close out
Transportation	**LSPGC Mitigation Measure 3.17-1c: Pre-Construction Coordination** Prior to construction within the public right-of-way or near railroad crossings, the Project Applicant shall coordinate with the appropriate transportation and infrastructure agencies to ensure that the design, alignment, and construction methods for trenching, duct bank installation, vaults, access roads, and other subsurface facilities do not adversely affect roadway geometry, rail infrastructure, or multimodal transportation facilities. This coordination shall include the following requirements: • Railroad Crossings and CPUC GO-88 Compliance: The Project Applicant shall confirm whether a California Public Utilities Commission (CPUC) General Order 88-B (GO-88-B) application is required for any work within or adjacent to railroad crossings. If applicable, the Applicant shall obtain CPUC approval under GO-88-B prior to construction and provide documentation to the CPUC. The Applicant shall coordinate with the applicable local jurisdiction and Union Pacific Railroad (UPRR) for all design, construction, and traffic control activities near rail crossings.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	• Coordination with City of San José Department of Transportation: The Project Applicant shall coordinate trench and duct bank design, alignment, and construction staging, including verification that subsurface or structural modifications will not create conflicts or hazards in geometric alignment or sight-distance, with project managers for the following City of San José Department of Transportation (DOT) projects: – Monterey Road Grade Separations Project. – Monterey Road Transit Project – Monterey Road Railroad Crossing Improvements (north of Curtner Avenue) – High Speed Rail Project. • Coordination with Adjacent Transportation and Transit Agencies: The Project Applicant shall coordinate with the Santa Clara Valley Transportation Authority (VTA) and Bay Area Rapid Transit (BART) for trenching and vault work located adjacent to existing or planned bus stops (including concrete bus pads), light-rail transit (LRT) facilities, or future BART station footprints, alignments, and construction staging/haul routes. Traffic control and access plans shall be designed to maintain safe pedestrian, bicycle, and transit operations consistent with City of San José standards and the San José Better Bike Plan 2025. • Coordination with the Monterey Road Wildlife Crossing Project and POST: The Project Applicant shall coordinate with the Monterey Road Wildlife Crossing design team and the Peninsula Open Space Trust (POST) to ensure consistency between proposed trenching or duct bank installations and planned crossing infrastructure. Any proposed design changes to subsurface facilities that could affect the wildlife crossing structure or roadway profile shall be reviewed in coordination with these entities prior to construction. • Traffic Control and Public Right-of-Way Management: The Project's traffic control plans shall include all City of San José public streets along the trench alignment (including but not limited to North 1st Street and Bassett Street), ensuring full compliance with City standard details and permitting requirements. All construction staging, lane closures, and detours shall be coordinated with City DOT to avoid cumulative disruption or unsafe geometric design changes. Documentation of agency coordination and final design approvals from each relevant entity (City of San José DOT, UPRR, VTA, BART, CPUC, and POST) shall be submitted to the CPUC prior to issuance of the Notice to Proceed for construction within affected rights-of-way. The Project shall implement all reasonable design modifications or timing adjustments requested by these agencies to maintain roadway safety and geometric integrity.			
Utilities and Service Systems	**LSPGC 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 identified natural gas pipelines, and all other utilities potentially affected by Project-related AC-induced corrosion (i.e., metallic utilities), design and construction of the Project's transmission lines shall be coordinated with the applicable utility owners to definitively locate each utility relative to the Metcalf to Grove 500 kV	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Notifications at least 90 days prior to construction AC-induced corrosion coordination prior to and during construction

Resource Area	Applicant Proposed Measures (APMs) PG&E Field Protocols (FPs), Best Management Practices (BMPs) and Mitigation Measures (MMs) Identified in the FEIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	AC underground 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 [metallic] pipelines or other utilities identified during these utility surveys; 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 have an AC potential of 2 volts or greater and a schedule to implement any required AC mitigation systems. Pursuant to Section 6.6.2 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 the AC potential to less than 2 volts, or an AC density level of less than a time-weighted average of 30 amperes per square meter. Prior to the start of construction of a Project segment containing an underground utility or utilities identified to be materially affected by accelerated corrosion caused by the Project, LSPGC shall submit the induction study for such Project 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 during construction of the Project, phased into the construction process as appropriate.			

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