



California Public Utilities Commission



March 27, 2026

Dustin Joseph
LS Power Grid California
5000 Hopyard Road, Suite 480
Pleasanton, CA 94588

RE: Notice to Proceed Request No. 1 for the Power Santa Clara Valley Project (A.24-04-017)

Dear Mr. Joseph:

On March 19, 2026, the California Public Utilities Commission (CPUC) adopted the Final Environmental Impact Report (FEIR) for the Power Santa Clara Valley Project (Project) and selected Alternative Combination 1 (AC-1)¹ for approval (Application 24-04-017). The CPUC Decision (26-03-042) granted LS Power Grid California (LSPGC) a Certificate of Public Convenience and Necessity (CPCN) and approved the Project conditionally with the implementation of Applicant Proposed Measures, Mitigation Measures, and Pacific Gas and Electric (PG&E) best management practices and field protocols adopted in the Construction Mitigation Monitoring, Compliance, and Reporting Program (Construction MMCRP). On March 20, 2026, LSPGC submitted a request for Minor Project Refinement No. 1 (MPR-1) to the CPUC seeking the approval to reconfigure Staging Area 6/Fairgrounds Staging Yard required to construct the Project as described in the FEIR. Approval of MPR-1 was granted by the CPUC on March 27, 2026, authorizing the modification of Staging Area 6 (Fairgrounds Staging Yard) from the FEIR pursuant to the site's availability for Project construction, as described in MPR-1 and below.

On March 20, 2026, LSPGC submitted a Notice to Proceed Request (NTPR-1) to the CPUC seeking the authority to proceed with preparation of Staging Area 6/Fairgrounds Staging Yard as shown in **Attachment A, NTPR-1 Components Map**. The proposed reconfigured area for the Fairgrounds Staging Yard, as identified in MPR-1, is approximately 10 acres.

This letter documents the CPUC's thorough evaluation of all activities covered in NTPR-1. The evaluation process ensures that all mitigation measures applicable to the location and activities covered in the Notice to Proceed are implemented as required in the CPUC's Decision 26-03-042. Upon receipt of this approval, LSPGC is authorized to initiate material deliveries to the Staging Area 6/Fairgrounds Staging Yard Project site and site preparation and construction activities at the site can begin with implementation of the conditions of approval in this NTP approval letter. LSPGC estimates that activities at the Fairgrounds Staging Yard and construction activities in general for the Project will conclude in March 2028.

Project Updates

The Final EIR (Section 2.8.2.1) identified 12 potential staging areas for Project use, including the Fairgrounds Staging Yard as Staging Area 6. The Fairgrounds Staging Yard described in the FEIR was approximately 12.6 acres. The property operator has notified LSPGC that a portion of the staging area as shown in the FEIR is no longer available for Project use, and therefore the configuration of the staging area has been modified pursuant

¹ The "project" selected for approval is AC-1, which is hereby described as the "Project."

to the site's availability for construction. As such, the new configuration of the Fairgrounds Staging Yard (approximately 10 acres) was approved by the CPUC on March 27, 2026. The activities described below that would occur within the approved reconfigured staging yard are consistent with the descriptions of staging areas contained within the Project's FEIR and Final CPUC Decision.

Activities Covered by NTPR-1

The Fairgrounds Staging Yard site is previously disturbed with minor vegetation that has grown through previously rocked or disturbed areas. Minor vegetation trimming or removal of nuisance vegetation may occur, if necessary, to prepare the site for staging activities, including removal of vegetation that may not have already been cleared as part of Fairgrounds maintenance activities. As the site is already flat and the proposed staging yard area is graveled, grading is not anticipated to be required. The staging area may be used for assemblage; for storage of materials and equipment, storage containers, construction trailers, portable restrooms; as a refueling area for vehicles and construction equipment; as an equipment wash station; and for parking and lighting. Transmission line and high voltage direct current (HVDC) materials required for the Project, such as conduit, cables, HVDC equipment, riser structures, bus, and rebar would be received and temporarily stored at the staging area as needed before installation.

Recycled water may be utilized for dust suppression onsite as needed (as discussed in Section 3.19.6.2 of the FEIR). Water trucks may utilize the existing recycled water filling station located in the northern corner of the Fairgrounds Staging Area site. Construction workers would typically meet at the staging area each morning and park their vehicles. Construction equipment and vehicles associated with Project construction would generally be parked within the staging area while inactive. The Fairgrounds Staging Yard would be accessed via existing driveways/access roads on Monterey Road and Umbarger Road.

Additional gravel may be placed as needed to create stable surface conditions and prevent unnecessary sediment transport off-site. Temporary perimeter security fencing would be installed around the outer limits of the staging area. Temporary lighting would also be installed for security purposes. Temporary construction power would be provided via existing distribution lines near the staging area. Temporary generators would be a contingency if distribution power is unavailable at the staging area. Hazardous materials such as diesel fuel would be stored as needed within the staging area in accordance with the Project's Hazardous Materials Management Plan (HMMP) and Spill Prevention, Control, and Countermeasure Plan (SPCCP).

Stormwater best management practices (BMPs) such as straw wattle would be installed within and surrounding the NTPR-1 staging area in accordance with the Project's Stormwater Pollution Prevention Plan (SWPPP). Following completion of Project construction, the Fairgrounds Staging Yard would be stabilized as needed in accordance with the SWPPP.

Preparation of the Fairgrounds Staging Yard is anticipated to begin in late March 2026, and use of the staging area is estimated to conclude in March 2028. Construction activities will generally be scheduled to occur during daylight hours six days per week (Monday through Saturday). Construction activities that may require the use of the Fairgrounds Staging Yard could infrequently be scheduled outside of these hours to avoid or reduce schedule delays, to accommodate the schedule for system outages, or to address emergencies. Night work may also be required by local jurisdictions but will be limited to the extent practicable.

Permits and Approvals

LSPGC will obtain all necessary permits prior to initiating the specific Project activities that trigger each permit requirement. In accordance with the Construction MMCRP, all permits acquired by LSPGC for the Project will be submitted to the CPUC for our records prior to commencing the activity for which the permits and approvals were obtained. Construction activities covered by NTPR-1 are anticipated to require the following State and local permits:

Agency	Permit	Applicability to Project Component	Status
State Water Resources Control Board (SWRCB)	National Pollutant Discharge Elimination System Permit (NPDES) for Discharge of Construction Related Stormwater	SWPPPs are required for stormwater discharges associated with construction activities that disturb more than 1 acre of land.	LSPGC has prepared a Notice of Intent (NOI) for use of the 2022 Construction General Permit which includes the Fairgrounds Staging Yard. LSPGC has provided the CPUC with a copy of the SWPPP (WDID# 2 43C411670
Santa Clara County Hazardous Materials Compliance Division (HMCD)	Permit/approval for hazardous materials storage and handling	Required for projects storing over 500-gallon fuel skid tanks, 55-gallon fuel and hydraulic fluid drums, motor oils/lubricants, and bentonite drilling mud.	LSPGC will obtain approval from HMCD prior to storing hazardous materials over applicable thresholds during construction activities covered by NTPR-1.
Santa Clara County	Building permit	A building permit may be required for use of temporary trailers within the Fairgrounds Staging Yard.	LSPGC will obtain a building permit prior to occupancy of temporary construction trailers on the Fairgrounds Staging Yard, as needed.

Construction MMCRP Measures and Conditions

The table below identifies all Applicant Proposed Measures (APMs), Mitigation Measures (MMs), and any applicable regulatory agency conditions described in the Construction MMCRP along with the status of compliance for actions proposed under NTPR-1:²

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
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.	Applicable	LSPGC and its contractors will implement this measure as needed during NTPR-1 construction activities.

² The table is color-coded as follows:

Measure Not Applicable to NTPR-1
Applicable to NTPR-1 – Measure to be Implemented During Construction/Restoration/Operation
Applicable to NTPR-1 – Preconstruction Status Pending/Ongoing
Applicable to NTPR-1 – Preconstruction Status Complete/Approved

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>APM AES-2: Site Design and Landscape Management Plan</p> <p>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:</p> <ul style="list-style-type: none"> 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. <p>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.</p>	Not applicable	The Fairgrounds Staging Yard is not located at the Skyline or Grove terminals.
<p>LSPGC Mitigation Measure 3.1-2: Minimize Fugitive Light from Temporary Sources Used for Construction</p> <p>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.</p>	Applicable	LSPGC and its contractors will implement this measure as needed during NTPR-1 construction activities.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>APM AQ-1: Construction Fleet Minimum Requirements and Tracking</p> <p>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.</p> <p>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.</p>	<p>Not Applicable <i>(measure superseded by MM 3.3-2a)</i></p>	<p>See MM 3.3-2a.</p>
<p>APM AQ-2: Dust Control Best Management Practices (BMPs)</p> <p>LSPGC shall implement the following measures, as needed, to control fugitive dust during construction activities:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>	<p>Not Applicable <i>(measure superseded by MM 3.3-2c)</i></p>	<p>See MM 3.3-2c.</p>

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>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.</p>	<p>Not Applicable</p>	<p>The Fairgrounds Staging Yard is not within an area with known NOA.</p>
<p>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.</p>	<p>Applicable</p>	<p>Ongoing: LSPGC submitted the initial equipment listing to CPUC in compliance with this measure on March 19, 2026. LSPGC will utilize the diesel-powered equipment-use hours tracking tool to track of daily equipment use hours of off-road, diesel-powered equipment, and will submit monthly reports to CPUC. If the Project transitions to using all Tier 4 Final certified equipment, use of the tracking tool and monthly reporting will no longer be required. In either case, LSPGC and its contractors will verify and document the certified engine tier before any new equipment is used for NTPR-1 activities.</p>

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>LSPGC Mitigation Measure 3.3-2c: Use Best Management Practices for Construction-Related Fugitive Dust Emissions</p> <p>LSPGC shall implement all of the following best management practices, which would reduce fugitive PM₁₀ and PM_{2.5} emissions:</p> <ul style="list-style-type: none"> • 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. <p>Hydroseed or apply non-toxic soil stabilizers to construction areas, including previously graded areas, that are inactive for at least 10 calendar days.</p>	<p>Applicable</p>	<p>LSPGC and its contractors will implement the best management practices related to fugitive dust emissions during NTPR-1 activities.</p>

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>APM BIO-1: Restoration of Disturbed Areas</p> <p>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.</p>	Applicable	There are no natural vegetation areas within Fairgrounds Staging Yard, however LSPGC and its contractors will restore the staging area to approximate preconstruction conditions following completion of NTPR-1 activities.
<p>APM BIO-2: Rare Plant Surveys</p> <p>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.</p>	Not Applicable	The Fairgrounds Staging Yard is disturbed/developed with no natural or sensitive vegetation; therefore, rare plants plant surveys are not required for NTPR-1.
<p>APM BIO-3: Preconstruction Sweeps</p> <p>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.</p>	Not Applicable	There is no native vegetation or suitable habitat for special-status species within the Fairgrounds Staging Yard; therefore, preconstruction sweeps are not required for NTPR-1.
<p>APM BIO-4: Sensitive Area Demarcation</p> <p>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.</p>	Not Applicable	No natural or sensitive biological areas are present within the Fairgrounds Staging Yard; therefore, preconstruction demarcation of sensitive areas is not required for NTPR-1.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>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.</p>	Not Applicable	There is no native habitat present within the Fairgrounds Staging Yard; therefore, vehicle cleaning is not required for NTPR-1.
<p>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.</p>	Applicable	LSPGC and its contractors will implement this measure during NTPR-1 construction activities.
<p>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.</p>	Applicable	LSPGC and its contractors will implement this measure as needed during NTPR-1 construction activities.
<p>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.</p>	Applicable	Ongoing. The Project WEAP was submitted to the CPUC on March 19, 2026. The WEAP includes protocols to avoid harming wildlife and reduce trash buildup during construction. All personnel will be WEAP-trained prior to performing work on the Project.
<p>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.</p>	Applicable	Pending. Preconstruction nesting bird surveys will be conducted prior to NTPR-1 construction activities. Surveys for roosting bats are not required for NTPR-1 as there is no suitable habitat for roosting bats within the Fairgrounds Staging Yard. However, if present, building and trailer eaves will be checked for signs of bat/bird roosting.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>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.</p>	Not Applicable	There is no suitable habitat for SJKF at the Fairgrounds Staging Yard; therefore, protocol surveys and preconstruction sweeps for SJKF are not required for NTPR-1 activities.
<p>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.</p>	Not Applicable	There are no excavations anticipated to be required as part of NTPR-1 activities.
<p>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.</p>	Not Applicable	There is no suitable habitat for special-status bird species within the Fairgrounds Staging Yard. If any special-status bird species are observed near the site during required preconstruction surveys or during construction, this measure will be implemented as needed.
<p>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.</p>	Not Applicable	There is no suitable habitat for raptors within the Fairgrounds Staging Yard. If raptor nests are observed near the site during required preconstruction surveys or during construction, this measure will be implemented as needed.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>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.</p>	<p>Applicable</p>	<p>Pending. Preconstruction nesting bird surveys will be conducted prior to the start of NTPR-1 construction activities. If any active nests are discovered, this measure will be implemented as needed.</p>
<p>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.</p>	<p>Not Applicable</p>	<p>Protocol surveys for special-status invertebrate species are not required for the Fairgrounds Staging Yard due to lack of suitable habitat for these species within the site.</p>

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>APM BIO-16: Special-Status Amphibian Surveys</p> <p>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.</p>	<p>Not Applicable</p>	<p>There is no suitable habitat for special-status amphibian species within the Fairgrounds Staging Yard site; therefore, protocol surveys are not required for NTPR-1 activities.</p>

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>LSPGC Mitigation Measure 3.4-1: Avoid Impacts to Rare Plants</p> <p>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 <i>Protocols for Surveying and Evaluating Impacts to Special-status Native Plant Populations and Natural Communities</i> (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.</p> <p>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 CNDDDB, 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:</p> <p>(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.</p> <p>(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.</p> <p>(3) Silt fencing or construction fencing to prevent vehicles, equipment, and personnel from accessing the occupied habitat.</p> <p>(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.</p> <p>(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.</p>	<p>Not Applicable</p>	<p>The Fairgrounds Staging Yard is disturbed/developed with no natural or sensitive vegetation; therefore, rare plants plant surveys are not required for NTPR-1 activities.</p>

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>LSPGC Mitigation Measure 3.4-2: Protection of Special-status Wildlife</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Not Applicable</p>	<p>There is no suitable habitat for special-status wildlife species within the Fairgrounds Staging Yard. If any special-status wildlife species are observed near the site during required preconstruction surveys or during construction, this measure will be implemented as needed.</p>
<p>LSPGC Mitigation Measure 3.4-3: Compensatory Mitigation</p> <p>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).</p>	<p>Not Applicable</p>	<p>No riparian habitat exists within the Fairgrounds Staging Yard. Therefore, no compensatory mitigation is not required for NTPR-1 activities.</p>

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>LSPGC Mitigation Measure 3.4-4: Habitat Restoration and Monitoring</p> <p>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.</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>	<p>Not Applicable</p>	<p>No sensitive habitat or waters of the U.S. and/or State exist within or adjacent to the Fairgrounds Staging Yard. Therefore, habitat restoration is not required for NTPR-1 activities.</p>

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>LSPGC Mitigation Measure 3.4-5: Compliance with Local Tree Ordinances</p> <p>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.</p>	Not Applicable	There are no street trees proposed for removal as part of NTPR-1 activities.
<p>APM CUL-1: WEAP Training</p> <p>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:</p> <ul style="list-style-type: none"> • Training on how to identify potential cultural resources and human remains during the construction process; • A review of applicable local, state, and federal ordinances, laws, and regulations pertaining to historic preservation; • A discussion of procedures to be followed in the event that unanticipated cultural resources are discovered during implementation of the Project; • A discussion of disciplinary and other actions that could be taken against persons violating historic preservation laws and LSPGC policies; and • A statement by the construction company or applicable employer agreeing to abide by the WEAP, LSPGC policies, and other applicable laws and regulations. <p>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).</p>	Applicable	<p>Ongoing. A qualified archaeologist prepared the cultural resources training included in the WEAP (submitted to CPUC March 20, 2026). LSPGC and its contractors will implement this measure throughout construction. WEAP sign-ins will be attached to the quarterly compliance reports.</p>

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>APM CUL-2: Cultural Resources Monitoring</p> <p>Archaeological and Native American 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.</p>	Not Applicable	<p>A portion of the Fairgrounds Staging Yard north of the access road in the northeast corner of the site falls within an existing cultural resource, the Santa Clara County Fairgrounds (P-43-003889). This resource has been recommended as not eligible for the National Register of Historic Places (NRHP). This area is bare ground, does not contain any historic structures, and has been previously used by the property owner for similar activity. Cultural resources monitoring is not required for NTPR-1 activities as there is no ground disturbance proposed within this area, nor are there any other known cultural resources within the Fairgrounds Staging Yard site.</p>
<p>APM CUL-3: Unanticipated Discovery of Potentially Significant Prehistoric and Historic Resources</p> <p>In the event that previously unidentified cultural resources are uncovered during implementation of the Project, all work within 100 feet (30 m) of the discovery shall be halted and redirected to another location. LSPGC's qualified archaeologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts shall occur, the resource shall be documented on State of California Department of Parks and Recreation (DPR) cultural resource records, and no further effort shall be required. If the resource cannot be avoided and may be subject to further impact, LSPGC's qualified archaeologist shall evaluate the significance and California Register of Historic Resources (CRHR) eligibility of the resources and, in consultation with the CPUC, determine appropriate treatment measures. Preservation in place shall be the preferred means to avoid impacts to significant historical resources. Consistent with CEQA Section 15126.4(b)(3), if it is demonstrated that resources cannot feasibly be avoided, LSPGC's qualified archaeologist, in consultation with the CPUC and, if the unearthed resource is prehistoric or Native American in nature, the Native American monitor shall develop additional treatment measures, such as data recovery consistent with CEQA Guidelines 15126.4(b)(3)(C)-(D). Archaeological materials recovered during any investigation shall be curated at an accredited curation facility or transferred to the appropriate Tribal organization.</p>	Not Applicable	<p>There is no excavation or grading proposed at the Fairgrounds Staging Yard. As there were no cultural resources observed during pedestrian surveys for the Fairgrounds Staging Yard site, there is no potential for discovery of unanticipated significant prehistoric or historic resources.</p>

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>APM CUL-4: Cultural Resources Inventory</p> <p>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.</p> <p>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, LS Power'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, LS Power'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, LS Power'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.</p>	<p>Applicable</p>	<p>Complete. The Fairgrounds Staging Yard was surveyed by a qualified archaeologist on February 19, 2026, and the report has been submitted as an attachment to MPR-1 (submitted March 20, 2026).</p>
<p>APM CUL-5: Unanticipated Discovery of Human Remains</p> <p>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.</p>	<p>Not Applicable</p>	<p>There is no excavation or grading proposed at the Fairgrounds Staging Yard. As such, there is no potential for an unanticipated discovery of human remains.</p>

<p>LSPGC Mitigation Measure 3.5-1: Cultural Resources Management Plan (CRMP)</p> <ul style="list-style-type: none"> • 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. • The LSPGC CRMP will be submitted to the CPUC for approval prior to implementation as well as all 	<p>Not Applicable</p>	<p>A portion of the Fairgrounds Staging Yard north of the access road in the northeast corner of the site falls within an existing cultural resource, the Santa Clara County Fairgrounds (P-43-003889). This resource has been recommended as not eligible for the National Register of Historic Places (NRHP). This area is bare ground, does not contain any historic structures, and has been previously used by the property owner for similar activity. Cultural resources monitoring is not required for NTPR-1 activities as there is no ground disturbance proposed within this area, nor are there any other known cultural resources within the Fairgrounds Staging Yard site. As there is no excavation or ground disturbance anticipated within the Fairgrounds Staging Yard site, there are no NTPR-1 activities proposed that would be subject to the CRMP.</p>
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Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>subsequent reports, plans, and resource documentation resulting from implementation of the CRMP.</p>		
<p>APM GEO-1: Geotechnical Studies and Geologic Hazard Reduction Measures</p> <p>The following measures shall be implemented during construction to minimize impacts from geological hazards and disturbance to soils:</p> <ul style="list-style-type: none"> • 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 <p>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.</p>	<p>Applicable</p>	<p>LSPGC and its contractors will implement this measure during construction. Geotechnical studies are not required for preparation and use of the Fairgrounds Staging Yard.</p>

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>APM PALEO-1: Paleontological Mitigation Monitoring Plan (PRMMP)</p> <p>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.</p> <p>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.</p>	Not Applicable	There is no excavation or grading proposed at the Fairgrounds Staging Yard. As such, there are no NTPR-1 activities that would be subject to the PRMMP.
<p>APM PALEO-2: Paleontological Resources Findings</p> <p>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.</p>	Not Applicable	There is no excavation or grading proposed at the Fairgrounds Staging Yard. As such, there is no potential for an inadvertent discovery of paleontological resources.
<p>APM HAZ-1: Site-Specific Spill Prevention, Control, and Countermeasure Plan (SPCCP)</p> <p>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.</p>	Applicable	Complete. NTPR-1 construction activities will be subject to a site-specific SPCC Plan if the total aboveground storage capacity exceeds 1,320 gallons of diesel (or other hazardous materials) in 55-gallon containers (or larger). As it is anticipated these thresholds will be exceeded during hazardous materials storage at Fairgrounds Staging Yard, the SPCC Plan was prepared and submitted to the CPUC for their records on March 19, 2026.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>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:</p> <ul style="list-style-type: none"> 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. <p>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.</p> <p>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.</p>	<p>Applicable</p>	<p>Complete: The HMMP was submitted to the CPUC on March 19, 2026, for their records. The HMMP will be implemented as required during NTPR-1 construction activities.</p>

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>APM HAZ-3: Skyline Terminal Soil and Groundwater Contamination Management</p> <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> 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. <p>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.</p>	Not Applicable	The Fairgrounds Staging Yard is not within or adjacent to the Skyline terminal; therefore, this measure does not apply to NTPR-1.
<p>APM HAZ-4: Soil Management Plan</p> <p>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:</p> <ul style="list-style-type: none"> Prior to commencement of construction activities within the 12 contaminated sites discussed above³, 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. 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. 	Not Applicable	There are no known soil contaminants within the Fairgrounds Staging Yard site, nor is there any excavation or grading proposed onsite, therefore, a site-specific Soil Management Plan is not required for the NTPR-1 activities.

³ See Section 5.9, Hazards, Hazardous Materials, and Public Safety, Table 5.9-1: Contaminated Sites, of the Proponent's Environmental Assessment.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>APM HAZ-5: Final Induction Study and Utility Coordination</p> <p>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.</p>	Not Applicable	NTPR-1 activities do not involve installation of transmission lines.
<p>APM WQ-1: Groundwater Dewatering and Discharge Measures</p> <p>Groundwater, if encountered during construction, shall be handled and discharged in accordance with all state and federal regulations including the following:</p> <ul style="list-style-type: none"> • 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 <p>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).</p>	Applicable	Although it is not anticipated that NTPR-1 construction activities will involve groundwater dewatering, dewatering that may occur in other areas of Project construction may be used for dust control within the Fairgrounds Staging Yard if suitable for land application. As needed, this measure will be implemented by LSPGC and its contractors during NTPR-1 construction activities.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>APM NOI-1: Vibration Monitoring for High Vibratory Equipment Contingency Plan</p> <p>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:</p> <ul style="list-style-type: none"> • Identification of vibration-sensitive structures within 25 feet of the final transmission line alignment where high vibratory equipment is planned to be used. • Where such structures are identified, LSPGC would attempt to use the following measures as necessary to avoid construction vibration impacts: <ul style="list-style-type: none"> – 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. <p>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.</p>	<p>Not Applicable</p>	<p>The Fairgrounds Staging Yard does not overlap with the 320 kV DC transmission line alignment. Vibration monitoring is not required for preparation and use of the Fairgrounds Staging Yard.</p>

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>LSPGC Mitigation Measure 3.13-1a: Nighttime Construction Noise Plan</p> <p>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:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>	<p>Applicable</p>	<p>LSPGC and its contractors will implement this measure as needed during NTPR-1 construction activities.</p>

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>LSPGC Mitigation Measure 3.13-3: Vibration Monitoring for High Vibratory Equipment Contingency Plan</p> <p>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:</p> <ul style="list-style-type: none"> • 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: <p>Place operating equipment on the construction site as far as feasible from vibration-sensitive receptors.</p> <p>Use smaller equipment to minimize vibration levels below the limits.</p> <p>Avoid using vibratory rollers and tampers near sensitive areas.</p> <p>Select construction methods that do not involve impact/vibratory tools (e.g., drilling) where feasible.</p> <ul style="list-style-type: none"> • 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. <p>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.</p>	<p>Not Applicable</p>	<p>Trenchless construction techniques or use of high vibratory equipment are not required for preparation and use of the Fairgrounds Staging Yard.</p>
<p>APM REC-1: Trail Management Plan</p> <p>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.</p>	<p>Not Applicable</p>	<p>NTPR-1 construction activities will not impact any existing trails where a Trail Management Plan will be required.</p>

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>APM REC-2: Trail Safety Crossing Measures</p> <p>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.</p>	Not Applicable	NTPR-1 construction activities will not impact the Coyote Creek Trail.
<p>APM REC-3: Trail Restoration</p> <p>Areas of Coyote Creek Trail that are temporarily disturbed by the Project activities shall be restored to approximate preconstruction conditions.</p>	Not Applicable	NTPR-1 construction activities will not impact the Coyote Creek Trail.
<p>APM TRA-1: Traffic Control Plan</p> <p>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.</p>	Not Applicable (Measure superseded by MM 3.17-1a)	See MM 3.17-1a.
<p>APM TRA-2: Coordinate Bus Stop Closures with Santa Clara VTA</p> <p>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.</p>	Not Applicable	NTPR-1 construction activities are not anticipated to require bus stop closures.
<p>APM TRA-3: Repair Infrastructure</p> <p>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.</p>	Not Applicable (Measure superseded by MM 3.17-1b)	See MM 3.17-1b.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>LSPGC Mitigation Measure 3.17-1a: Implement Coordinated Traffic Control Plan</p> <p>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:</p> <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> 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. <p>LSPGC's traffic control plan, with proof of coordination, shall be submitted to the CPUC before the start of applicable construction activities.</p>	<p>Not Applicable</p>	<p>Traffic control is not anticipated to be required for NTPR-1 activities. In the event traffic control is determined to be required at the staging area, a Traffic Control Plan will be approved by the applicable local jurisdiction and will be submitted to the CPUC prior to the start of traffic control activities.</p>
<p>LSPGC Mitigation Measure 3.17-1b: Infrastructure Repair Reporting</p> <p>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).</p>	<p>Applicable</p>	<p>LSPGC and its contractors will implement this measure as needed for NTPR-1 construction activities.</p>

<p>LSPGC Mitigation Measure 3.17-1c: Pre-Construction Coordination</p> <p>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:</p> <ul style="list-style-type: none"> • 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. • 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. <ul style="list-style-type: none"> • 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. 	<p>Not Applicable</p>	<p>NTPR-1 activities are not anticipated to interfere with any existing utilities, and there is no excavation required at Fairgrounds Staging Yard with the exception of shallow ground disturbance required for fence installation and SWPPP BMP installation.</p>
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Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<ul style="list-style-type: none"> 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. <p>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.</p>		
<p>APM TCR-1: WEAP Training</p> <p>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.</p> <p>The WEAP shall include, at a minimum:</p> <ul style="list-style-type: none"> Training on how to identify potential TCRs and human remains during the construction process; A review of applicable regulations pertaining to TCRs; A discussion of procedures to be followed in the event that unanticipated TCRs are discovered during implementation of the Project; A discussion of culturally appropriate dignity, taking into account the Tribal cultural values and meaning of the resource, including the cultural character and integrity, traditional uses, and confidentiality of resources. A statement by the construction company or applicable employer agreeing to abide by the WEAP, LSPGC policies, and other applicable laws and regulations. <p>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.</p>	Applicable	<p>Ongoing. The Project WEAP was submitted to the CPUC on March 20, 2026 and includes training on identification and procedures related to TCRs and human remains. All personnel will be WEAP-trained prior to performing work on the Project.</p>

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>APM TCR-2: Cultural Resources Monitoring</p> <p>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 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.</p>	Not Applicable	There are no known prehistoric or ethnohistoric archaeological sites within the Fairgrounds Staging Yard, nor is there any excavation or grading proposed onsite. As such, this measure is not applicable for NTPR-1.
<p>APM UTIL-1: Coordination with Utilities</p> <p>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.</p>	Not Applicable	NTPR-1 activities are not anticipated to interfere with any existing utilities, and there is no excavation required at Fairgrounds Staging Yard with the exception of shallow ground disturbance required for fence installation and SWPPP BMP installation.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-1	Compliance Action / Status
<p>LSPGC Mitigation Measure 3.19-5: Utility Coordination and Induction Study</p> <p>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.</p> <p>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 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, <i>Alternating Current Corrosion on Cathodically Protected Pipelines: Risk Assessment, Mitigation and Monitoring</i>, 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.</p> <p>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.</p>	<p>Not Applicable</p>	<p>NTPR-1 activities are not anticipated to interfere with any existing utilities, and there is no excavation required at Fairgrounds Staging Yard with the exception of shallow ground disturbance required for fence installation and SWPPP BMP installation.</p>

LSPGC is authorized to proceed with the proposed construction activities associated with NTPR-1 provided that documentation will be submitted to the CPUC confirming that all proposed actions and applicable measures that have yet to be implemented are carried out in accordance with the methods and conditions described in NTPR-1. This NTP approval is subject to completion of the following implementing actions by LSPGC prior to the start of construction:

- LSPGC and its contractors will provide CPUC with photo documentation of the Fairgrounds Staging Yard preconstruction conditions following completion of NTPR-1 activities, in compliance with APM BIO-1.
- Preconstruction nesting bird surveys will be conducted prior to the start of NTPR-1 construction activities, in compliance with APM BIO-9 and APM BIO-14. If any active nests are discovered, these measures will be implemented as needed.

- Surveys for roosting bats are not required for NTPR-1 as there is no suitable habitat for roosting bats within the Fairgrounds Staging Yard. However, if present, building and trailer eaves within the Fairgrounds Staging Yard should be checked for signs of bat/bird roosting.
- LSPGC will notify the CPUC when dewatering occurs in other areas of Project construction and this water is found suitable for land application and dust control within the Fairgrounds Staging Yard. As needed, APM WQ-1 measure will be implemented by LSPGC and its contractors during NTPR-1 construction activities.
- In the event that activities occur at the Fairgrounds Staging Area and/or its access driveways before 7:00 a.m. or after 7:00 p.m., implementation of Mitigation Measure 3.13-1a: Nighttime Construction Noise Plan will be applicable and LSPGC must submit a Nighttime Construction Noise Plan for CPUC review and approval, and associated nighttime construction activities cannot start until CPUC approval has been granted.

Sincerely,

Cesar Moreno

Cesar Moreno
CPUC Environmental Project Manager

cc: Silvia Yanez, ESA
Rosalind Searle, ESA

Dustin Joseph
March 27, 2026
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Attachment A, NTPR-1 Components Map