



California Public Utilities Commission Fulton-Fitch Mountain Reconductoring Project

Mitigation Monitoring, Compliance, and Reporting Plan

February 2018

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California Public Utilities Commission

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ACRONYMS AND ABBREVIATIONS

ACRONYMS AND ABBREVIATIONS

APM	applicant proposed measure
BMP	best management practice
Cal-IPC	California Invasive Plant Council
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
Caltrans	California Department of Transportation
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CHRIS	California Historical Resources Information System
CPUC	California Public Utilities Commission
EI	Environmental Inspector
EM	Environmental Monitor
FAA	Federal Aviation Administration
GIS	geographic information systems
kV	kilovolt
MM	mitigation measure
MMCRP	Mitigation Monitoring, Compliance, and Reporting Plan
MMRP	Mitigation Monitoring and Reporting Program
MPR	Minor Project Refinement
NAHC	Native American Heritage Commission
NOT	Notice of Termination
NPDES	National Pollutant Discharge Elimination System
NTP	Notice to Proceed
PEA	Proponent's Environmental Assessment
PRC	Public Resources Code
PTC	Permit to Construct
ROW	right-of-way
RWQCB	Regional Water Quality Control Board
PG&E	Pacific Gas and Electric Company
SF ₆	sulfur hexafluoride
SWCRB	State Water Resources Control Board
SWPPP	Stormwater Pollution and Prevention Plan
US	United States
USACE	US Army Corps of Engineers
USFWS	US Fish and Wildlife Service

1 INTRODUCTION

1.1 PROJECT OVERVIEW

Pacific Gas and Electric Company (PG&E) submitted an application to the California Public Utilities Commission (CPUC) on December 3, 2015, for a Permit to Construct (PTC) the proposed Fulton-Fitch Mountain Reconductoring Project (project). The application included the Proponent's Environmental Assessment (PEA) prepared pursuant to Rule 2.4 of the CPUC's Rules of Practice and Procedure. PG&E proposes to replace the conductor on a 9.9-mile-long section of the Fulton-Hopland 60-kilovolt (kV) Power Line (Fulton-Hopland line or 60-kV line) between Fulton Substation and Fitch Mountain Substation. The project would also include replacing poles along 8 miles of the Fulton-Hopland line, replacing conductor on 1.4 miles of the Geysers #12-Fulton 230-kV Transmission Line (Geysers #12 line or 230-kV line), and making modifications to Fitch Mountain Substation. Project detail maps with the locations of project facilities and construction work areas are provided in Appendix A.

The CPUC prepared an Initial Study/Mitigated Negative Declaration (IS/MND), pursuant to the California Environmental Quality Act (CEQA), the amended State CEQA Guidelines (14 California Resources Code 15000 et seq.), and the CPUC CEQA Rule 2.4, to address the potential impacts of the project on the environment. On July 21, 2017, the CPUC issued a Draft IS/MND for a 30-day public review and comment period. Responses to all comments received on the Draft IS/MND were included in Section 5 of the Final IS/MND along with minor changes to the Draft IS/MND based on the comments that were received. The CPUC adopted the Final IS/MND (State Clearinghouse No. 2017072049) and granted PG&E's PTC the approved project on December 14, 2017, in accordance with Public Resources Code (PRC) § 15074.

1.2 MITIGATION MONITORING, COMPLIANCE, AND REPORTING PLAN

1.2.1 Authority

PG&E is required to implement applicant proposed measures (APMs) and mitigation measures (MMs) specified in the Final IS/MND, as well as to obtain and implement various agency permits applicable to the project, in order to avoid or reduce potentially significant impacts on the environment. As the CEQA lead agency, the CPUC is responsible for monitoring and enforcing compliance with these requirements, and to adopt a reporting or monitoring program, pursuant to PRC § 21081.6 and Section 15097 of the CEQA Guidelines. Chapter 4 of the IS/MND included a Mitigation Monitoring and Reporting Program (MMRP) that describes a recommended framework for preparing and implementing a Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP) prior to construction of the project. The CPUC adopted the MMRP framework with its decision on the project.

2 SUMMARY OF REQUIREMENTS

This MMCRP was prepared pursuant to the adopted MMRP, and in accordance with PRC § 21081.6 and Section 15097 of the CEQA Guidelines. PG&E was consulted during development of the MMCRP and given an opportunity to comment on its contents. PG&E's comments have been incorporated into the Final MMCRP. The contents of the MMCRP may be updated if necessary to further clarify expectations, add new procedures, or revise procedures.

1.2.2 Contents

The contents of the MMCRP are intended to:

- Ensure project impacts on the environment are avoided or reduced adequately as specified in the IS/MND
- Summarize all mitigating requirements that would be monitored by the CPUC
- Organize the mitigating requirements by category and implementation phase for clarity
- Identify the roles and responsibilities for key project personnel on the PG&E compliance team and the CPUC monitoring team
- Establish clear expectations for the PG&E and CPUC teams by identifying specific procedures

1.2.3 Schedule

The proposed construction schedule for the project and duration of work for key features is presented in Table 1.2-1. The actual construction schedule may vary slightly. PG&E is responsible for informing the CPUC of any substantial changes to the proposed construction schedule well in advance. PG&E shall provide the CPUC with construction schedule updates on a frequent basis during construction (refer to Section 4.1.5).

The MMCRP shall be implemented before, during, and after construction. Implementation of the MMCRP will end when the CPUC Project Manager determines there is no further need for CPUC monitoring of the project. PG&E is required to perform restoration monitoring for up to 5 years following construction (specified in MM Biology-11: Wetland Mitigation). It is anticipated that implementation of the MMCRP would continue through the majority of PG&E's post-construction monitoring period.

2 SUMMARY OF REQUIREMENTS

Table 1.2-1 Proposed Construction Schedule

Construction Activity	Period Start	Period End	Estimated Duration
Southern Segment			
Site Development	February 2019	February 2019	4 weeks
Conductor Removal and Installation	March 2019	April 2019	2 months
Cleanup and Restoration ^a	May 2019	May 2019	4 weeks
<i>Total Segment Construction</i>	<i>February 2019</i>	<i>May 2019</i>	<i>4 months</i>
Northern Segment			
Site Development	June 2018	August 2018	3 months
Conductor Removal			2 months
Pole Removal	August 2018	December 2018	4 months
Pole Installation			4 months
Conductor Installation			2 months
Cleanup and Restoration ^a	December 2019	January 2019	2 months
<i>Total Segment Construction</i>	<i>June 2018</i>	<i>January 2019</i>	<i>8 months</i>
Fitch Mountain Substation ^b			
Initial Modifications ^c	June 2018	September 2018	2 months
Final Modifications ^d	March 2019	April 2019	
Road/Surface Paving	April 2019	May 2019	3 weeks
Total Project Construction	June 2018	May 2019	12 months

Notes:

- ^a The start of final cleanup and restoration would depend on the ground conditions when construction activities are completed. Generally, all project work areas would be kept clean and stabilized during construction through standard work practices and implementation of the SWPPP.
- ^b Construction activities at Fitch Mountain Substation would occur intermittently over the course of work in the Southern and Northern Segments, depending on the phasing of work that would occur along the initial 650 feet of the Fitch Mountain #1 Tap.
- ^c Initial substation modifications would be completed prior to approximately September 2018 to accommodate rerouted power from the Fulton-Hopland line south of the Fitch Mountain #1 Tap.
- ^d Final substation modifications would be completed once construction is complete in the Southern Segment and the Fulton-Hopland line is re-energized.

Source: (PG&E, 2016-2017)

2 SUMMARY OF REQUIREMENTS

2.1 REQUIREMENT SOURCES

The scope of requirements addressed in the MMCRP primarily originate from the APMs and MMs identified in the IS/MND, as well as the federal, state, and local permits and authorizations described in the IS/MND, that would have a mitigating effect on the project's environmental impacts. In addition to the requirements described in the IS/MND, the MMCRP identifies procedural requirements to verify and document implementation, as well as communication protocols for the PG&E and CPUC project teams (refer to Section 4, Procedures).

Table B-1 located in Appendix B lists all APMs and MMs from the adopted MMRP. Table B-1 includes the following information:

- Titles and full text of the required APMs and MMs
- Applicable locations where implementation would occur
- Performance standards, and applicable timing and implementation phase
- MMCRP tracking references

Federal, state, and local agencies have jurisdiction over lands and resources in the project area. Potentially applicable permits are identified in the IS/MND Project Description, and several APMs and MMs include requirements to obtain permits and/or agency authorizations.

2.2 REQUIREMENT CATEGORIES AND IMPLEMENTATION PHASES

The project requirements addressed in the MMCRP can be separated into eight categories, which are applicable during one or more implementation phase (e.g, Before Construction, During Construction, After Construction)¹. Requirement categories for the project are summarized as follows:

- **Permits and Authorizations.** Requirements that involve obtaining a permit or authorization from the CPUC or another agency, or otherwise consulting with an agency prior to an activity.
- **Plans.** Requirements that involve preparing project plans specified in the IS/MND or permits, and submitting such plans to CPUC and jurisdictional agencies for review and approval, where specified. At a minimum, all plans must be submitted to CPUC for record keeping, including plan revisions.

¹ Some requirements are applicable following construction; however, there are no mitigating requirements applicable during the operation and maintenance phase.

2 SUMMARY OF REQUIREMENTS

- **Notifications.** Requirements that involve notifying the public, CPUC, or other agencies prior to initiating specific project activities, or if issues or the need for changes beyond the scope of the approved project description arise.
- **Worker Training.** Requirements that involve training workers on resource avoidance, impact minimization, communication procedures, and other project requirements.
- **Surveys.** Requirements that involve surveying project areas prior to or during construction to identify potentially sensitive environmental resources.
- **Field Monitoring.** Requirements that involve field monitoring (e.g., inspection or observation) during construction in sensitive areas, or when sensitive resources could be encountered.
- **Avoidance and Minimization.** Requirements that involve specific activities to avoid or minimize impacts on sensitive resources.
- **Reporting.** Requirements that involve documenting and/or reporting construction or compliance activities.

2.2.1 Permits and Authorizations

Table C-1, located in Appendix C, summarizes permits and authorizations that PG&E may be required to obtain from the CPUC and other jurisdictional agencies prior to an activity. The actual need for such permits and authorizations would be determined by the jurisdictional agencies. Table C-1 will be used to track the status of permits and authorizations (refer to Section 5.1.1, Tracking Systems).

Some permits for the project may include their own subset of requirements, including plans, notifications, worker training, field monitoring, impact avoidance and minimization measures, and reporting. Where applicable, permit requirements will be incorporated into the associated requirement tracking tables addressed in this section and located in Appendix C.

2.2.2 Plans

Several of the project APMs and MMs (refer to Table B-1) require PG&E to prepare project-specific plans to guide the implementation of complex mitigation requirements during one or more project phases. Table C-2, located in Appendix C, lists project plans and placeholders for agency submittal and approval dates. Some of the plans would only be required under certain conditions, as specified in the source APM or MM. Table C-2 will be used to track the status of plans for the project, and will be updated on an ongoing basis throughout implementation of the MMCRP.

Project plans require varying levels of review from jurisdictional agencies; however, CPUC review and approval is required for all final versions of plans identified in Table C-2. If agency review of a plan is required, PG&E must submit each agency's comments to the CPUC so the CPUC may verify that the comments were adequately addressed. If plans are revised following CPUC approval, the revised plans must be recirculated for review and comment to all agencies with applicable oversight responsibilities.

2 SUMMARY OF REQUIREMENTS

As with permits, some project plans include their own subset of requirements, including notifications, worker training, monitoring, impact avoidance and minimization measures, and reporting. Where applicable, plan requirements will be incorporated into the associated requirement tracking tables addressed in this section and located in Appendix C.

2.2.3 Notifications

PG&E is responsible for notifying members of the public, sensitive receptors, and other utilities that may be affected by construction. PG&E is also required to notify the CPUC and entities at certain stages of the project, or under specific conditions, to ensure that stakeholders are aware of important project information. Table C-3, located in Appendix C, lists required notifications, entities to notify, and the dates of notification.

Table C-3 will be used to track the status of required notifications for the project, and will be updated on an ongoing basis throughout implementation of the MMCRP. Notification requirements will be complete when the tracking table is fulfilled, and PG&E provides adequate documentation to the satisfaction of the CPUC.

MMCRP procedures addressed in Section 4 include notification timelines for certain events. These notifications will be tracked separately from the notifications addressed in Table C-3.

2.2.4 Worker Training

2.2.4.1 Environmental Training Program

Multiple APMs, MMs, and project plans specify worker training and communication procedures either prior to working on the site or during morning tailboard meetings. PG&E is responsible for preparing training materials and implementing an environmental training program (ETP) for workers and other project personnel. Worker training requirements are summarized in Table 2.2-1.

All project personnel, including construction workers and compliance monitoring workers, must participate in the ETP prior to working on the project site. Personnel that have not participated in the ETP must be escorted by a designated PG&E or CPUC representative who has received the full ETP training.

Table 2.2-1 Summary of Worker Training Requirements

Requirement Sources	Training Topics
APM BIO-1a: Environmental Awareness Training	Training shall include: discussion of avoidance and minimization measures implemented to protect potential listed and special-status species, and nesting birds, and their presence, life history, and habitat requirements; information provided on wetlands, and other water resources; and consequences of noncompliance with state and federal protection acts.
MM Biology-10: Sudden Oak Death Procedures	Training shall include: requirements and BMPs for reducing the spread of the Sudden Oak Death pathogen.

2 SUMMARY OF REQUIREMENTS

Requirement Sources	Training Topics
MM Cultural-2: Cultural Resource Training	Training shall address: appropriate work practices necessary to effectively avoid or protect known or discovered historical resources, archaeological resources, tribal cultural resources, and human remains; potential for exposing subsurface resources, basic signs of a potential resource, and required procedures if a potential resource is identified; requirements for working near archaeological resource site CA-SON-1256.
MM Hazards-1: Hazardous Materials Procedures and Worker Training	Training shall include: specific procedures for hazardous materials and emergency response.
MM Hazards-2: Construction Fire Prevention Plan	Training shall include: fire prevention and suppression methods.
APM PAL-2: Worker Environmental Awareness Training	Training shall include: recognition and protection of paleontological resources.

2.2.4.2 Levels of Training

Due to variations in the types of workers and duration of time they may spend on site, three levels of training may be provided, each with graduated levels of access to the project site. Access to some site locations may be restricted to those who have had the appropriate level of training.

Two limited training levels may be acceptable for delivery drivers and site visitors, depending on access location, presence of fully trained personnel, and risk of encountering resources or hazards. Delivery drivers who have limited site access and would only be on site for a short time may receive a shortened training that is focused on select resources and hazards with which they may come into contact. Similarly, site visitors may receive a shortened training, but must be escorted by a designated PG&E or CPUC representative who has received the full training. Workers that receive a limited training must complete the full training before accessing the site without an escort.

2.2.5 Surveys

Multiple APMs and MMs, as well as project permits and plans, require PG&E to complete field based survey requirements, such as formal or protocol level surveys, reconnaissance inventories and evaluations, or clearances. The frequency, timing, and formality of the survey requirements vary depending on the targeted resource and implementation phase. Survey requirements for the project are summarized in Table 2.2-2 by resource topic.

PG&E is required to submit pre-construction survey results (in some cases reports) to the CPUC, and if necessary USFWS and CDFW, for review and acceptance prior to initiating construction or any other site development activities. PG&E shall provide documentation of USFWS and CDFW acceptance of pre-construction surveys to CPUC prior to initiating construction.

2 SUMMARY OF REQUIREMENTS

Surveys must be completed by qualified individuals, as applicable and specified in the requirement source. Personnel conducting surveys for several resources must also be approved by the CPUC, and potentially by USFWS and CDFW. Surveyor requirements are the same as those described for specialty monitors addressed in Section 2.2.6.

Table C-4, located in Appendix C, lists the timing and frequency of required surveys, and will serve as an implementation table for these requirements. Table C-4 will be used to track the status and results of surveys, and will also address the need for any monitoring or avoidance and minimization requirements due to the presence of a resource. Table C-4 will be updated on an ongoing basis throughout implementation of the MMCRP. Survey requirements will be complete when PG&E provides adequate documentation that surveys were completed.

Table 2.2-2 Summary of Survey Requirements

Resource/Topic	Requirement Sources	Freq. Before Construction ^a	Freq. During Construction	Freq. After Construction
California tiger salamander	APM BIO-7 SRPCS	Once	Ongoing	--
American badger	APM BIO-8	Once	Ongoing	--
Western pond turtle	APM BIO-9	Once	Ongoing	--
Special-status plants	MM Biology-2 *Special-status Plant Salvage and Replanting Plan	Once during blooming period (within 2 years of construction)	*As needed at the salvage and relocation site only	*Annually until success criteria are met
California red-legged frog	MM Biology-3	Once	Ongoing	--
Foothill yellow-legged frog	MM Biology-4	Once	*Ongoing	--
Nesting birds (e.g., Special-status and Protected Migratory Birds)	MM Biology-5	Once	Approximately weekly during nesting season ^b	--
Special-status and protected bats	MM Biology-6	Once	--	--
Temporarily disturbed areas	MM Biology-7	Once	--	Annually until success criteria are met
Sensitive plant communities	MM Biology-9	Once	--	*Annually until success criteria are met
Vegetation infected with Sudden Oak Death	MM Biology-10	Once	--	--
Cultural resources	MM Cultural Resources-3	*Once	--	--

2 SUMMARY OF REQUIREMENTS

Resource/Topic	Requirement Sources	Freq. Before Construction ^a	Freq. During Construction	Freq. After Construction
Geotechnical investigation	APM GS-3 MM Geology-1	Once	--	--

Notes:

^a If construction is delayed for more than 30 days or otherwise specified, pre-construction surveys may need to be repeated, as determined through coordination with CPUC, and potentially USFWS and CDFW.

^b The nesting bird season is generally from February 1 through August 31, but may be earlier or later depending on species nesting patterns and weather conditions.

* Requirements marked with an asterisk are only applicable under specified conditions, as noted in the requirement source.

2.2.6 Field Monitoring

In addition to the general mitigation monitoring effort addressed in the MMCRP, PG&E is required to assign specific on-site monitoring duties to select personnel. Several project APMs and MMs include specific on-site monitoring requirements that must be performed during or following construction to ensure impacts to resources are reduced or avoided. There are two types of monitoring requirements for the project, specialty monitoring and general monitoring, which are both discussed further below.

Monitoring requirements may depend on the presence of sensitive resources identified during surveys listed in Table 2.2-2. The results of surveys and presences of resources will be tracked in Table C-4.

2.2.6.1 Specialty Field Monitoring

Specialty monitors are required to perform the majority of the monitoring requirements for the project. Personnel performing these tasks must meet the minimum qualifications identified in the associated APMs and MMs. In addition, agency approval is required for many of the specialty monitors performing these roles. Specialty monitor requirements are listed in Table 2.2-3. Specialty monitors assigned by PG&E and approved by the applicable agencies will be listed in Table D-2 located in Appendix D.

Table 2.2-3 Summary of Specialty Field Monitoring Requirements

Monitoring Target	Requirement Sources	Minimum Qualifications ^a	Review/Coordination
California tiger salamander	APM BIO-1k APM BIO-7 MM Biology-1 SRPCS	Bachelor's degree or above in a biological science field and demonstrated field experience with California tiger salamander	CPUC *CDFW *USFWS
American badger	APM BIO-1k APM BIO-8 MM Biology-1	Bachelor's degree or above in a biological science field and demonstrated field experience with American badger	CPUC *CDFW *USFWS

2 SUMMARY OF REQUIREMENTS

Monitoring Target	Requirement Sources	Minimum Qualifications ^a	Review/Coordination
Western pond turtle	APM BIO-1k APM BIO-9 MM Biology-1	Bachelor's degree or above in a biological science field and demonstrated field experience with western pond turtle	CPUC *CDFW *USFWS
California red-legged frog	APM BIO-1k MM Biology-1 MM Biology 3	Bachelor's degree or above in a biological science field and demonstrated field experience with California red-legged frog	CPUC *CDFW *USFWS
Foothill yellow-legged frog	APM BIO-1k MM Biology-1 MM Biology-4	Bachelor's degree or above in a biological science field and demonstrated field experience with foothill yellow-legged frog	CPUC *CDFW *USFWS
Nesting birds	MM Biology-1 MM Biology-5	Qualified Avian Biologist: Bachelor's degree or above in a biological science field and demonstrated field experience with ornithology, particularly in nesting behavior and nest detection Avian Monitor: Bachelor's degree or above in a biological science field and demonstrated experience surveying or monitoring nesting birds	CPUC
Special-status and protected bat	MM Biology-1 MM Biology-6	Bachelor's degree or above in a biological science field and demonstrated field experience with special-status and protected bats	CPUC
Special-status plants	MM Biology-1 MM Biology-2	Bachelor's degree or above in a biological science field and demonstrated field experience with field botany and special-status plants in the region	CPUC *CDFW *USFWS
Invasive weeds	MM Biology-1 MM Biology-7	Bachelor's degree or above in a biological science field and demonstrated field experience with field botany or native plant restoration, and familiar with native and invasive plants in the region	CPUC
Sensitive natural plant communities	MM Biology-1 MM Biology-9	Bachelor's degree or above in a biological science field and demonstrated field experience with field botany or native plant restoration, and familiar with sensitive plant communities in the project area	CPUC
Sudden Oak Death	MM Biology-1 MM Biology-10	A qualified botanist, biologist, or arborist with demonstrated field experience working with vegetation infected with Sudden Oak Death and procedures for preventing the spread of Sudden Oak Death	CPUC
Wetlands	MM Biology-1 MM Biology-11	Bachelor's degree or above in a biological science field and demonstrated field experience with wetland resources	CPUC

2 SUMMARY OF REQUIREMENTS

Monitoring Target	Requirement Sources	Minimum Qualifications ^a	Review/Coordination
Cultural and tribal cultural resources	APM CR-1 MM Cultural-1	Experience with California/regional history; and local Native American history, traditions, and customs and shall meet the US Secretary of Interior Professional Qualifications Standards as published in 36 CFR Part 61 ²	CPUC
Paleontological resources	MM Paleontology-1 MM Paleontology-2	Qualified Paleontologist: Master's or PhD in geology or paleontology, have knowledge of the local paleontology, and be familiar with paleontological procedures and techniques Paleontological Monitor: Bachelor's degree or above in geology or paleontology and experience in the collection and salvage of fossil remains	CPUC
Erosion, sediment, and pollution control	MM Hydrology-2 SWPPP	Qualified SWPPP Developer (QSD) and Qualified SWPPP Practitioner (QSP)	N/A
Notes:			
^a Minimum qualifications for specialty monitors are specified in the applicable requirement sources. When no specific qualifications were identified, it is expected the individuals performing specialty monitoring will have at least a B.A. or B.S. in a relevant field and sufficient experience and/or training to perform the required monitoring duties adequately.			
* Requirements marked with an asterisk are only applicable under specified conditions, as noted in the requirement source.			

2.2.6.2 General Field Monitoring

Any qualified and designated personnel may perform monitoring tasks where there is no discipline or agency approval requirements specified. General monitor requirements are listed in Table 2.2-4. Personnel performing these roles must be provided the necessary training beyond the minimum worker training requirements covered in the ETP (refer to Table 2.2-1).

² 36 CFR Part 61 states the minimum qualifications are a graduate degree in archeology, anthropology, or closely related field plus: at least one year of full-time professional experience or equivalent specialized training in archeological research, administration or management; at least four months of supervised field and analytic experience in general North American archeology; and a demonstrated ability to carry research to completion.

2 SUMMARY OF REQUIREMENTS

Table 2.2-4 Summary of General Field Monitoring Requirements

Monitoring Target	Requirement Sources	Training/Designation Requirements
General wildlife entrapment	APM BIO-1k	PG&E-designated and trained personnel (excavation inspection only; any wildlife removal must be performed or overseen by a qualified biological monitor)
Slope stability	MM Geology-1 Geotechnical Investigation Report	PG&E-designated and trained personnel
Fire watch and fire patrol	MM Hazards-2 Construction Fire Prevention Plan	PG&E-designated and trained personnel

2.2.7 Avoidance and Minimization

All APMs and MMs, as well as project permits and plans, contain general impact avoidance and minimization goals; however, some requirements from these sources include specific actions to implement if resources are identified during pre-construction surveys or construction clearances. This section addresses avoidance and minimization requirements that will be implemented during construction and restoration activities to avoid or minimize impacts to resources that are present. Impact avoidance and minimization requirements for the project can be summarized by the following actions:

- Avoiding sensitive areas by communicating to workers and through the installation of signs, flagging, and/or barriers
- Avoiding sensitive periods or seasons (e.g., nighttime, wet season, or reproductive seasons)
- Using specific work techniques, materials, or equipment known to reduce impacts
- Scheduling work activities during less sensitive periods or seasons
- Providing ongoing reminders and environmental training to workers

The applicability of avoidance and minimization requirements may depend on the presence of sensitive resources identified during surveys listed in Table 2.2-2. The results of surveys and presences of resources will be tracked in Table C-4.

2.2.8 Reporting

Reporting is a key element of the MMCRP for both documentation and communication purposes, and both PG&E and CPUC are responsible for reporting requirements.

2.2.8.1 PG&E

PG&E is responsible for preparing general MMCRP reports to document all construction and compliance activities, as well as specific reports identified in APMs and MMs. Reporting activities may also be required by permits and plans. Table 2.2-5 summarizes PG&E’s specific reporting requirements specified in APMs and MMs, and/or project plans. Table 2.2-6 summarizes PG&E’s general reporting requirements associated with the compliance effort.

2 SUMMARY OF REQUIREMENTS

Note: A Compliance Checklist PDF form is located in Appendix E. This form should be updated and submitted with each Weekly Compliance Summary Report for the same reporting period. The checklist form will serve to reduce the written reporting effort and give credit to PG&E for complying with day-to-day compliance activities that frequently are not described in the Weekly Compliance Summary Report. The Weekly Compliance Summary Report will be used to elaborate on important details described in the checklist and does not need to address every construction or compliance activity, especially if activities are proceeding in an ongoing and continuous manner. Note: the original PDF form provided with the MMCRP should be copied and updated without changing the format of the PDF (rasterizing or merging with other PDF documents) in order to maintain the form's data field functions.

2 SUMMARY OF REQUIREMENTS

Table 2.2-5 Summary of Specific PG&E Reporting Requirements

Report	Preparation/Submittal Frequency	Requirement Sources ^a	Contents
Before Construction			
Special-status Plant Survey Report(s)	Survey report(s) submitted to CPUC no less than 30 days prior to construction	MM Biology-2: Special-status Plants	Report shall identify: the botanists' names and qualifications; a description of the survey dates, methods, and a description of the survey efforts, including a list of the species that were searched for; results of the plant inventory evaluation; suitable habitat that was encountered; maps (1: 3,000 scale) that identify final project work areas and access routes; locations of suitable habitat within the project study area; the extent of focused plant surveys that cover project areas located in suitable habitat; enumeration and description of encountered special-status plant individuals or populations; and recommendations for avoiding the plants, where feasible.
Pre-Construction Report (general vegetation and habitat impacts)	Pre-Construction Report to the CPUC at least 30 days prior to construction	MM Biology-7: Revegetation, Restoration, and Monitoring Plan	Report shall: quantify and document anticipated impacts on vegetation resources; identify special-status plant individuals or the characteristics of populations; the types and numbers of tree and shrub individuals; restoration acreages for grassland, woodland, and forest vegetation communities; the baseline conditions for adjacent and comparable vegetation resources; maps (1: 3,000 scale) that identify the types and locations of the vegetation resources that may be impacted; the limits of the planned work areas; and project access routes.
Pre-Project Trail Condition Report	Pre-Project Trail Condition Report is submitted to the CPUC no less than 30 days prior to construction	MM Recreation-1: Trail Conditions and Repairs	Report documents the condition of designated trails located within project work areas or access routes.

2 SUMMARY OF REQUIREMENTS

Report	Preparation/Submittal Frequency	Requirement Sources ^a	Contents
Geotechnical Investigation Report	Geotechnical Investigation Report is submitted to the CPUC no less than 60 days prior to construction	APM GS-3: Site-specific Geotechnical Investigation MM Geology-1: Geotechnical Investigation Report	Report areas that are suspected to have unstable soils or landslide susceptibility and evaluate the potential for surface fault rupture for poles within and adjacent to potentially active fault traces and earthquake fault zones. Report shall provide site-specific recommendations for poles, work areas, and access routes where there is an elevated risk of geologic hazards.
During Construction			
Monthly ETP Logs	Information collected daily and submitted to CPUC monthly during construction	APM BIO-1a: Environmental Awareness Training MM Biology-10: Sudden Oak Death Procedures MM Cultural-2: Cultural Resource Training MM Hazards-1: Hazardous Materials Procedures and Worker Training MM Hazards-2: Construction Fire Prevention Plan APM PAL-2: Worker Environmental Awareness Training	Training logs and sign-in sheets for staff who have participated in the ETP, including their training level (refer to Section 2.2.4.1).
Monthly Noise Complaint Reports	Information collected daily and submitted to CPUC monthly during construction	MM Noise-1: General Construction Noise	Description of noise complaints received during construction, complaining party information, and response to the complaints including name of responder.

2 SUMMARY OF REQUIREMENTS

Report	Preparation/Submittal Frequency	Requirement Sources ^a	Contents
Nesting Bird Reports ^b	Information collected daily/as needed and submitted to CPUC monthly during construction occurring within the avian nesting season (generally between February 1 and August 31) Annual summary reports shall be prepared and submitted to CPUC during construction for each nesting season	MM Biology-5: Special-status and Protected Migratory Birds	Description of nests identified during the monthly reporting period including the location, species, exclusion buffer, construction activities within buffers, and monitoring observations. Report should include a map of the locations and buffers. Annual summary of all avian-related monitoring results and outcomes.
*CHRIS Reports	Inadvertent discovery reports are filed with CHRIS and the CPUC	MM Cultural-1: Archaeological Monitoring and Cultural Resource Discoveries MM Cultural-4: Data Recovery	Report shall include the methods and results of the cultural resource evaluation and/or data recovery.
SWPPP Visual Inspection and Storm Reports	Prepared for each qualifying rain event (QRE) (0.5 inch or more of precipitation within a 48 hour or greater period between rain events) and quarterly for non-stormwater discharges. Submitted to the Regional Water Board and CPUC upon request until SWPPP coverage is complete ^c	MM Hydrology-1: SWPPP Development and Implementation MM Hydrology-2: SWPPP Monitoring Program SWPPP	Visual inspection observations, proposed erosion and sediment control details, any corrective actions, the results of water quality sampling, and analysis of stormwater discharges associated with the project site.
SWPPP Numeric Action Level (NAL) Exceedance Reports	Prepared when values for parameters for pH and turbidity are exceeded and submitted to the Regional Water Board and CPUC upon request		Sampling methodology, a description of the best management practices (BMPs) associated with the sample that exceeded the NAL and the proposed corrective actions taken.

2 SUMMARY OF REQUIREMENTS

Report	Preparation/Submittal Frequency	Requirement Sources ^a	Contents
SWPPP Monthly and Annual Reports	Prepared monthly and annually for each year of SWPPP coverage and submitted to CPUC until SWPPP coverage is complete ^c		Stormwater data, evaluations, required forms, a summary of all corrective actions taken during the compliance year, and identification of any compliance activities or corrective actions that were not implemented.
After Construction			
Post-Construction Report(s) & Annual Monitoring Reports (general vegetation and habitat impacts)	Prepared and submitted to CPUC on an annual basis	MM Biology-7: Revegetation, Restoration, and Monitoring Plan MM Biology-9: Sensitive Natural Plant Communities	<p>Post-Construction Reports: summary tables of actual vegetation impacts with maps. Summary tables shall include the location name/ID for each impact area, anticipated impact acreage from the Pre-Construction Report, and actual impact acreage during construction. The report shall include a brief statement about revegetation, restoration, and monitoring procedures that would be implemented where impacts occurred, as defined in the approved Revegetation, Restoration, and Monitoring Plan.</p> <p>Annual Monitoring Reports: Once revegetation and restoration begin, summary of survey results in restoration areas and revegetation progress or corrective actions until the performance standards and success criteria have been achieved.</p>
Post-Project Trail Condition Report	Prepared and submitted to CPUC once within 30 days following construction in each project segment	MM Recreation-1: Trail Conditions and Repairs	Documentation of trail restoration and comparison with the Pre-Project Trail Condition Report.
*Annual Progress Reports for Special-status Plant Salvage and Relocation	Prepared and submitted to CPUC on an annual basis	MM Biology-2: Special-status Plants *Special-status Plant Salvage and Replanting Plan	Report shall discuss the progress and success of the salvage plan, and any corrective measures.

2 SUMMARY OF REQUIREMENTS

Report	Preparation/Submittal Frequency	Requirement Sources ^a	Contents
Notes:			
^a Refer to the referenced measures for additional details regarding reporting requirements.			
^b Monthly Nesting Bird Reports are not required if work does not occur within the preliminary buffers during the month as specified in MM Biology-5.			
^c SWPPP coverage and reporting requirements typically begin with the start of construction and extend into the post-construction restoration period. SWPPP coverage ends when the project site is stabilized, disturbed areas reach a minimum of 70 percent vegetation coverage, and Notice of Terminations (NOTs) have been filed ending SWPPP coverage. SWPPP reports and other documents are submitted to the SWRCB via the SMARTS website, and can be downloaded by entering the project Wastewater Discharger Identification (WDID) Number located in the SWPPP.			
* Requirements marked with an asterisk are only applicable under specified conditions.			

2 SUMMARY OF REQUIREMENTS

Table 2.2-6 Summary of General PG&E Reporting Requirements

Report	Preparation/Submittal Frequency	Requirement Sources	Contents
During Construction			
Daily Compliance Reports	Prepared daily and submitted to CPUC upon request during construction	MMCRP	Detailed description of the construction and compliance activities, as well as any issues, resolutions, and MMCRP procedures implemented, for each work day. Reports should include supporting photographs.
Weekly Compliance Summary Reports (with completed Compliance Checklist forms)	Prepared and submitted to CPUC weekly during construction	MMCRP *MM Cultural-1: Archaeological Monitoring and Cultural Resource Discoveries	Summary of Daily Compliance Reports with supporting photographs, a completed compliance checklist form (located in Appendix E), and a description of any important meetings during the reporting period. Any Incident Reports and supporting documentation shall be attached. The compliance summary reports will serve as the core method for PG&E to communicate project activities to CPUC and to document their compliance effort. *Summary of the discovery findings and evaluation conclusions of non-historic or unique resource shall be documented and provided.
Incident Reports	Prepared and submitted to CPUC within one business day of observation	MMCRP	Detailed description of incidents as described in Section 4.3.
After Construction			
Final Construction Compliance Report	Prepared and submitted to CPUC once within 90 days following construction	MMCRP	Summary of all construction and compliance activities that occurred prior to and during construction, summary of issues and resolutions, discussion of project outcomes and any lessons learned for future projects, and a status update for all project requirements (Table B-1 and requirement tracking tables).
<p>Note:</p> <p>* Requirements marked with an asterisk are only applicable under specified conditions.</p>			

2 SUMMARY OF REQUIREMENTS

2.2.8.2 CPUC

The CPUC is responsible for preparing general MMCRP reports to document the status and results of the mitigation monitoring effort, to summarize the information provided by PG&E at an executive level, and to track important information about the project. Table 2.2-7 summarizes the CPUC’s general reporting requirements associated with the mitigation monitoring effort.

Table 2.2-7 Summary of General CPUC Reporting Requirements

Report	Preparation Frequency	Requirement Sources	Contents
Daily Inspection Reports	Prepared daily and submitted to CPUC monthly during construction, or upon request	MMCRP	Detailed description of the construction and compliance activities, as well as any issues, resolutions, and MMCRP procedures implemented, for each day CPUC Environmental Monitors (EMs) visits the site
Monthly Monitoring Summary Reports	Prepared and submitted to CPUC monthly during construction	MMCRP	Summary of Daily Monitoring Reports and PG&E’s Weekly Compliance Summary Reports and Checklists, important documentation provided by PG&E (e.g., reports and logs), a description of any important meetings and discussions, and MMCRP procedures that were implemented during the reporting period
Post-construction Monitoring Report	Prepared and submitted to CPUC once following construction	MMCRP	Summary of all monitoring activities that occurred prior to and during construction, summary of issues and resolutions, discussion of project outcomes and any lessons learned for future projects, and a status update for all project requirements (Table B-1 and requirement tracking tables) with a summary of any remaining tasks that must be completed
Final Monitoring Report (if necessary)	Prepared and submitted to CPUC once to finalize MMCRP implementation	MMCRP	Summary of all monitoring activities that occurred following construction and compliance with requirements that were not documented as complete in the Post-Construction Monitoring Report The necessity of the report will be determined by the CPUC Project Manager

3 ROLES AND RESPONSIBILITIES

PG&E and CPUC, including their contractors, are collectively responsible for ensuring environmental impacts addressed in the IS/MND are adequately mitigated; however, PG&E is primarily responsible for compliance by implementing project requirements. CPUC is responsible for monitoring PG&E's compliance by verifying that implementation is completed adequately, and enforcing appropriate corrective actions if the project is not in compliance.

This section describes specific PG&E and CPUC roles and responsibilities for the project, and titles that will be assigned to personnel in these roles.

A list of designated personnel who will perform these roles, including their organization and contact information, will be located in Table D-1 located in Appendix D. Table D-1 shall be updated as needed throughout implementation of the MMCRP to reflect personnel changes.

3.1 PG&E

3.1.1 PG&E Compliance Team

3.1.1.1 PG&E Project Manager

PG&E is responsible for designating the project manager who will provide overall direction, management, leadership, and corporate coordination for the project. The PG&E Project Manager's responsibilities shall include:

- Coordinating construction, engineering, and PG&E's environmental personnel
- Integrating environmental responsibilities into all levels of the project organization
- Ensuring compliance with all APMs, MMs, permit conditions, plan requirements, and the MMCRP
- Communicating project activities, schedules, and public relations issues to the project teams

3.1.1.2 PG&E Compliance Manager

PG&E is responsible for designating a compliance manager to oversee the overall compliance effort. The PG&E Compliance Manager shall be the lead PG&E representative responsible for implementing environmental requirements and the MMCRP. The PG&E Compliance Manager's responsibilities shall include:

- Understanding and planning for project requirements and construction needs
- Coordinating PG&E's environmental personnel, and ensuring that qualified monitoring personnel are available and informed of their responsibilities, and have been approved by CPUC when applicable

3 ROLES AND RESPONSIBILITIES

- Communicating environmental requirements to the PG&E Compliance Team and Construction Managers
- Communicating with the CPUC Monitoring Team regarding environmental requirements, construction needs, construction schedule changes, and MMCRP procedures described in Section 4
- Ensuring compliance with project requirements
- Reporting the effectiveness of mitigation and regularly submitting required reports and documentation to CPUC
- Providing leadership to correct any issues with environmental compliance

3.1.1.3 PG&E Compliance Supervisor

PG&E is responsible for designating at least one person to supervise the day-to-day compliance effort. The PG&E Compliance Supervisor shall support the role of the PG&E Compliance Manager and may perform any duties that are delegated by the PG&E Project Manager and the PG&E Environmental Compliance Manager.

3.1.1.4 PG&E Environmental Inspector(s)

PG&E is responsible for designating at least one environmental inspector who will be regularly present at the project site to oversee and verify the day-to-day compliance effort. The PG&E Environmental Inspector (EI) shall work closely with construction personnel and shall be the primary field employee responsible for verifying and documenting environmental compliance. Multiple PG&E EIs may be needed to effectively monitor compliance during periods of high construction activity or high monitoring demand. The PG&E EI's responsibilities shall include:

- Understanding environmental project requirements and construction needs
- Taking direction from the PG&E Compliance Manager and Compliance Supervisor
- Communicating construction needs and possible conflicts with environmental requirements to the PG&E Compliance Manager and PG&E Compliance Supervisor
- Supporting construction staff to ensure work is conducted in compliance with environmental requirements
- Overseeing specialty monitoring activities, or performing such duties when appropriate and approved to do so
- Implementing communication procedures described in the MMCRP
- Ensuring that resources are avoided, and impacts are minimized as specified by all project requirements
- Determining the effectiveness of mitigation and reporting whether adjustments need to be made to the PG&E Compliance Manager and Compliance Supervisor

3.1.1.5 PG&E Specialty Monitors

PG&E is responsible for designating personnel to perform required or as needed specialty monitoring requirements. Agency approval is required for several specialty monitoring roles as well as minimum qualifications. Specialty monitoring roles for the project are listed in Table 2.2-3 above, including minimum qualifications and agency approval requirements for designated personnel performing these roles. EIs may also perform specialty monitoring roles if

3 ROLES AND RESPONSIBILITIES

they possess the appropriate qualifications and experience, and have received applicable agency approval. Table D-2 located in Appendix D lists designated specialty monitors, their contact information, and dates of agency approval, if applicable.

3.1.1.6 PG&E General Monitors

Several project requirements require general monitoring tasks. General monitoring can be conducted by any personnel if there are no minimum qualifications or agency approval requirements. General monitor requirements are listed in Table 2.2-4 above. Personnel performing these roles shall be provided training specific to the monitoring responsibility that is more detailed than the minimum worker training requirements included in the ETP (refer to Table 2.2-1). PG&E EIs may perform general monitoring tasks in conjunction with their other inspection and monitoring duties if appropriate.

3.1.2 Construction Workforce

3.1.2.1 Construction Managers

PG&E shall identify Construction Managers for the project who are responsible for work crews. Construction Managers shall provide support to the PG&E Project Manager and oversee the activities of construction personnel. Construction Manager responsibilities include:

- Implementing contractor compliance with PG&E specifications, construction contracts, and applicable codes
- Coordinating with PG&E Compliance Personnel regarding implementation of project APMs and MMs, permit conditions, plan requirements, MMCRP procedures
- Planning construction activities around environmental requirements and reporting any potentially infeasible requirements and work area constraints to the PG&E Compliance Team
- Communicating construction needs and schedule changes to the PG&E Compliance Team
- Regularly facilitating field meetings with construction and environmental staff

3.1.2.2 Construction Supervisors

At PG&E's discretion, on-site responsibilities for Construction Managers may be delegated to Construction Supervisors (i.e., crew foreman). Construction Supervisors provide support to Construction Managers. Construction Supervisors shall be responsible for communicating with Construction Managers and PG&E EIs to ensure day-to-day construction activities are conducted in compliance with all project requirements.

3.1.2.3 Construction Workers

Construction workers who enter the project site are responsible for following all environmental project requirements. Construction workers are responsible for attending required environmental trainings addressed in the ETP that are applicable to their position. Any questions regarding project requirements shall be directed towards PG&E Construction Managers, PG&E Construction Supervisors, and/or PG&E EIs.

3 ROLES AND RESPONSIBILITIES

3.2 CPUC

3.2.1 CPUC Monitoring Team

3.2.1.1 CPUC Project Manager

The CPUC Project Manager is the lead representative for the CPUC and the sole CPUC employee on the CPUC Monitoring Team. The CPUC Project Manager shall oversee the mitigation monitoring effort and is responsible for making final determinations regarding MMCRP procedures, requirement clarifications, and compliance issues.

3.2.1.2 CPUC Monitoring Manager

CPUC is responsible for designating a monitoring manager who will support the CPUC Project Manager and provide oversight to the mitigation monitoring effort. The CPUC Monitoring Manager's responsibilities shall include:

- Reviewing CPUC monitoring reports and discussing non-compliance issues with the CPUC PM
- Reviewing reports and other documentation provided by PG&E for MM compliance
- Reviewing NTPs, MPRs and Temporary Extra Work Space (TEWS) requests and submitting to CPUC PM for approval and sign-off
- Acting as a project liaison on the CPUC's behalf to work with PG&E public affairs staff and address community issues and concerns should they arise
- Working with the PG&E Compliance Personnel to resolve any issues and incidents
- Coordinating with other jurisdictional agencies as needed

3.2.1.3 CPUC Monitoring Supervisor

CPUC is responsible for designating a monitoring supervisor who will support the CPUC Project Manager and the CPUC Monitoring Manager by overseeing the day-to-day mitigation monitoring effort. The CPUC Monitoring Supervisor shall perform the delegated duties of the CPUC Monitoring Manager. The responsibilities of the CPUC Monitoring Supervisor include:

- Providing oversight of the CPUC Monitoring Team and conducting routine monitoring activities described in the MMCRP on behalf of the CPUC
- Implementing CPUC's responsibilities for MMCRP procedures, and verifying PG&E fulfills its responsibilities
- Reviewing all pre-construction mitigation plans and preparing draft review memoranda for the CPUC PM, and keeping a record of MMCRP procedures
- Coordinating field personnel for the CPUC Monitoring Team to inspect the project site(s)
- Determining the appropriate frequency of site visits for CPUC environmental monitors (EMs)
- Conducting regular site visits at beginning of construction, with frequency adjusted as appropriate

3 ROLES AND RESPONSIBILITIES

- Verifying and documenting PG&E's compliance with all project requirements prior to, during, and following construction, and creating an independent record of project compliance
- Documenting any incidents with compliance, reporting them to the CPUC PM, tracking the project compliance incidents record, and working with the CPUC Monitoring Team and PG&E Compliance Personnel to resolve any compliance incidents
- Reviewing all CPUC and PG&E daily and weekly monitoring reports
- Preparing MMCRP monthly compliance reports and submitting to the CPUC
- Preparing NTPs for Monitoring Manager's review and CPUC's review and sign-off
- Reviewing and processing MPRs and TEWS requests
- Reviewing PG&E's compliance reports for consistency with field observations and identifying and reconciling any inconsistencies
- Coordinating all aspects of the project with the PG&E Compliance Personnel

3.2.1.4 CPUC Environmental Monitors

CPUC Environmental Monitors (EMs) shall be identified for the project. CPUC EMs shall be the primary field personnel for CPUC and responsible for verifying compliance with project requirements at the project site as directed by the CPUC Monitoring Team. Additional monitors may be used as needed depending on concurrent construction activities and specific monitoring needs. The responsibilities of the CPUC EMs are:

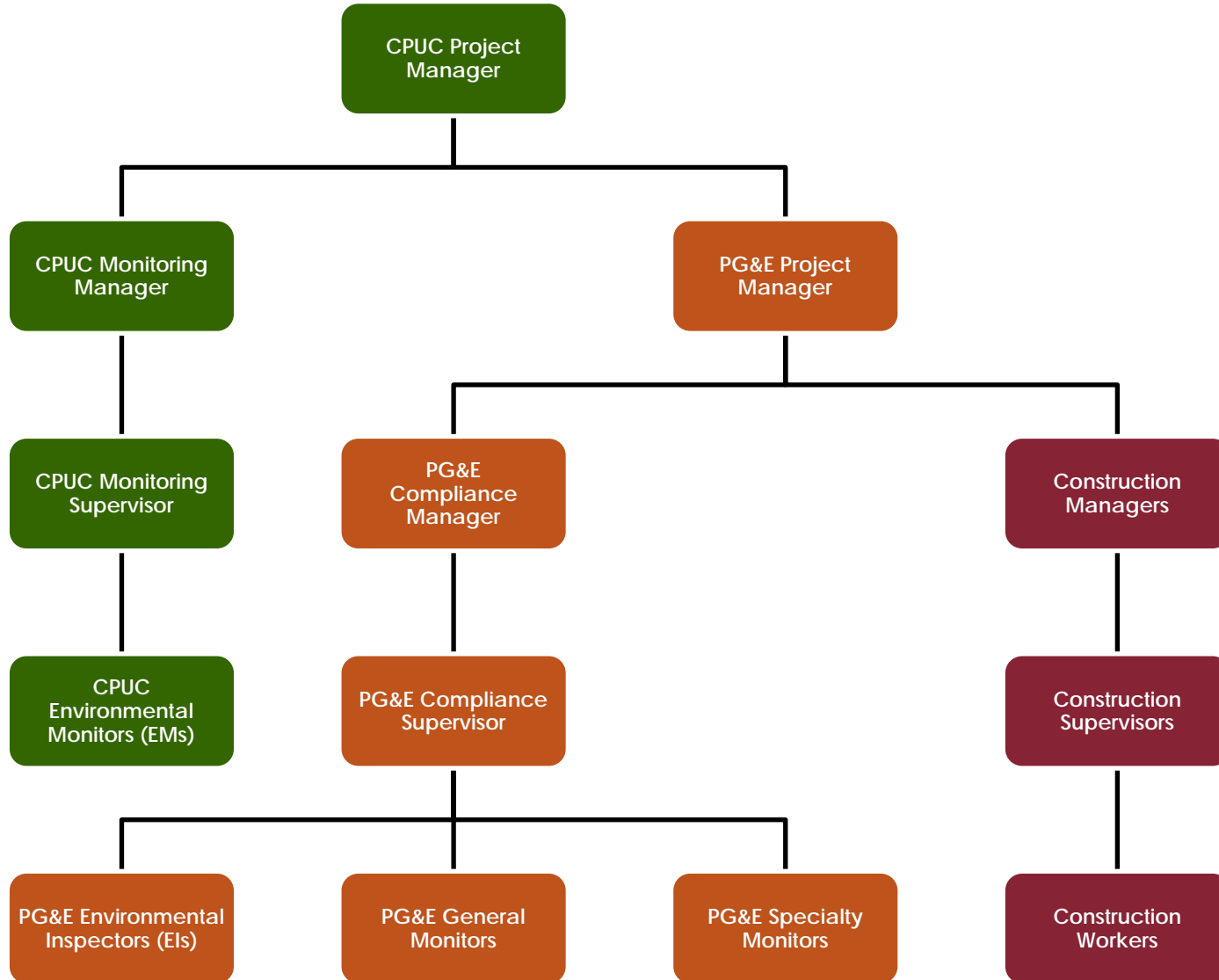
- Inspecting the project site, documenting construction and compliance activities, and reporting any potential issues and incidents
- Preparing and submitting daily monitoring reports to the CPUC Monitoring Managers, and relaying any important information about the project delivered in the field

3.3 PROJECT ORGANIZATION CHART

An organizational chart of CPUC and PG&E project personnel is shown on Figure 3.3-1. The organization chart illustrates preliminary lines of communication between project team members. The names of individuals performing the roles and their contact information will be listed in Tables D-1 and D-2 located in Appendix D. Both CPUC and PG&E are responsible for keeping one another informed of staffing changes and providing contact information.

3 ROLES AND RESPONSIBILITIES

Figure 3.3-1 Project Organization Chart



3 ROLES AND RESPONSIBILITIES

3.4 JURISDICTIONAL AGENCIES

Personnel from jurisdictional agencies may periodically visit the project site to verify compliance, or request information regarding compliance with various project requirements, or in response to a violation, should one occur. PG&E is responsible for satisfying requests from jurisdictional agencies, submitting the permits and authorizations to CPUC, and notifying CPUC of any changes to agency requirements in a timely manner. PG&E shall provide CPUC with documentation (i.e., email correspondence, letters, and/or memoranda) related to final agency approvals, if CPUC is not directly involved with the coordination effort. The CPUC may contact jurisdictional agencies at any time regarding the project and to clarify agency requirements, permit conditions, or approvals relating to their jurisdiction, as needed.

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This section addresses MMCRP procedures for personnel identified in Section 3 that shall be implemented prior to, during, and following construction, in order to facilitate successful implementation and documentation of project requirements. Procedures in this section include general communication guidelines, standard CPUC practices, and documentation tools developed from experience with past CPUC projects that involved mitigation monitoring oversight.

4.1 COMMUNICATION GUIDELINES

Clear communication will be critical for successful implementation of the MMCRP, and will reduce the likelihood of issues that may arise, such as project delays, compliance violations, and safety incidents. Environmental and construction personnel must regularly communicate and maintain professional and responsive communications at all times. The PG&E Compliance Team and CPUC Monitoring Team must coordinate closely to clarify questions regarding implementation before issues occur, to develop expectations regarding compliance documentation, and to resolve any issues that may arise in a timely manner. This section addresses general communication procedures for the project.

4.1.1 Meetings

PG&E or CPUC may request as-needed meetings on an occasional or regular basis to discuss construction and compliance activities, proposed project changes, reporting and documentation procedures, compliance procedures, and to resolve issues. Meetings may be held in the field at the project site or over the phone. Key decision makers from the PG&E and CPUC teams shall be given an opportunity to participate in important meetings. The results of all meetings shall be documented in MMCRP reports prepared by both PG&E and CPUC.

4.1.2 Site Visit Coordination

Field personnel from both PG&E and CPUC shall coordinate site visits with a designated PG&E EI who is familiar with authorized construction activities, project requirements, and any restricted areas (i.e., dangerous conditions, unauthorized work areas or work on private properties, or the presence of sensitive resources). Conditions in the field may change rapidly and PG&E field personnel must ensure that all field personnel are adequately informed of restricted areas, parking locations, and communication procedures on an ongoing basis.

A CPUC EM shall conduct routine site inspections. Site inspections would generally be conducted when project activities are occurring; however, site visits may be conducted during inactive periods if necessary. At a minimum, the CPUC EM will coordinate with a designated

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PG&E EI prior to visiting the site. If contact cannot be made, the CPUC monitoring personnel will inspect open project areas on foot. The CPUC EM shall at no time pass through fences unless authorized or escorted by a member of the PG&E Compliance Team who is familiar with the property.

4.1.3 Questions and Clarifications

Questions and the need to clarify project requirements will periodically arise throughout the implementation process. Both PG&E and CPUC shall submit important questions and clarifications in writing via email. Resolutions and any CPUC determinations shall be documented in compliance and monitoring reports, and/or in email correspondence. Questions and clarifications that take an extended period of time to resolve shall be tracked by the CPUC Monitoring Team until a resolution has been reached.

4.1.4 Requests for Documentation

The CPUC Monitoring Team may periodically request written documentation and confirmations from the PG&E Compliance Team that will be entered into the project record. Requests for documentation and confirmations shall be submitted via email. If the information will take an extended period of time to gather, both PG&E and CPUC shall agree upon a timeframe to respond, and the request shall be tracked by the CPUC Monitoring Team until a resolution has been reached.

4.1.5 Schedule Updates

PG&E shall inform the CPUC Monitoring Team immediately of any delays in the construction schedule that may affect the project and implementation of the MMCRP.

4.1.6 Dispute Resolution

Disputes or complaints may develop between PG&E and CPUC if there are conflicting opinions regarding project requirements and procedures. It is expected that the MMCRP will reduce or eliminate the potential for disputes; however, disputes may occur even with the best preparation.

Any issues shall first be addressed informally at the field level between the CPUC EM and PG&E EI, or during project progress meetings. Questions may be directed to other members of the PG&E Compliance Team and the CPUC Monitoring Team as needed. If the issue cannot be resolved informally in the field, the following procedures shall be implemented:

- **Step 1.** Disputes and complaints (including those from the public) should be directed first to the CPUC Project Manager, for resolution. The Project Manager would attempt to resolve the dispute.
- **Step 2.** Should this informal process fail, the CPUC Project Manager may initiate enforcement or compliance actions to address deviations from the approved project or adopted MMRP.

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- **Step 3.** If a dispute or complaint regarding the implementation or evaluation of the MMRP cannot be resolved informally or through enforcement or compliance action by the CPUC, any affected participant in the dispute or complaint may file a written “notice of dispute” with the CPUC’s Executive Director or his/her designee. This notice should be filed in order to resolve the dispute in a timely manner, with copies concurrently served on other affected participants. Within 10 days of receipt, the Executive Director or designee(s) shall meet or confer with the filer and other affected participants for purposes of resolving the dispute. The Executive Director shall issue an Executive Resolution describing his/her decision, and serve it on the filer and other affected participants.
- **Step 4.** If one or more of the affected parties is not satisfied with the decision as described in the Executive Resolution, such party(ies) may appeal it to the CPUC via a procedure to be specified by the CPUC.

Affected parties may also seek CPUC review through existing procedures specified CPUC’s Rules of Practice and Procedure for formal and expedited dispute resolution, although a good faith effort should first be made to use the foregoing procedure.

4.2 NOTICE TO PROCEED PROCESS

PG&E is required to obtain CPUC authorization prior to initiating project activities through the Notice to Proceed (NTP) process. The NTP process involves the PG&E Compliance Team submitting a NTP request package to the CPUC Monitoring Team, and the CPUC Project Manager issuing a NTP Authorization Letter. Project activities may be authorized through one or more NTPs for separate project phases as determined necessary by the PG&E Compliance Team and the CPUC Monitoring Team. At a minimum, NTP request packages shall include the following information:

- NTP request number
- Date submitted to CPUC
- Requested approval date
- Anticipated start and end date for the proposed actions
- A detailed description of the proposed actions requested in the NTP
- A summary list of any previously authorized actions (if applicable) as detailed in NTP Authorization Letters
- A summary list of any actions that have not been proposed or authorized that must be included with future NTP requests
- Updated versions of the four require tracking tables described in Section 5.1.1 (Tables C-1, C-2, C-3, and C-4)
- A summary list of any outstanding requirements and documentation not included with the NTP package, and the anticipated dates it will be provided
- Any Minor Project Refinements or Temporary Extra Workspace related to the proposed actions (refer to Section 4.4)

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The CPUC Monitoring Team shall review NTP requests to ensure the proposed actions are consistent with the IS/MND and final CPUC decision, and to verify compliance with all pre-construction requirements. The CPUC Monitoring Team may request additional information during the NTP review process as needed. Once it has been determined that all pre-construction requirements have been completed and documented to the satisfaction of CPUC, the CPUC Project Manager will submit an NTP Authorization Letter to the PG&E Compliance Team. The NTP Authorization Letter will address any conditions of approval, and include applicable documentation as necessary for the authorized actions.

Note: It is highly suggested that PG&E consult the CPUC well in advance of submitting NTP requests to establish clear expectations. Incomplete NTP Requests may result in delays to the construction schedule.

4.3 INCIDENTS

The goal of this MMCRP is to plan for and avoid any issues that could occur during implementation; nonetheless, there is a potential for issues to arise due to a variety of factors. For the purposes of this MMCRP, any issues that are observed with compliance, issues related to health and safety, or public complaints shall be documented as incidents. This section addresses incidents that may occur and procedures that shall be followed to document them.

4.3.1 Incident Categories

Incident categories for the project include compliance level incidents, health and safety incidents, and public complaints.

4.3.1.1 Compliance Level Incidents

PG&E and CPUC are responsible for evaluating compliance and addressing any issues throughout implementation of the MMCRP. Issues with compliance will be documented by assigning one of four severity levels and associated terms. If all project requirements are being followed and no issues are observed, then the project would be at an acceptable compliance level (Level 0: Acceptable) and no further actions are required. A description of compliance levels that will be used for the project and examples of compliance level incidents are listed in Table 4.3-1.

When documenting compliance level incidents, the reporting party shall assign an initial compliance level that appropriately represents the severity of the issue based on factors including, but not limited to the following:

- Scope of the deviation or violation
- Risk of impact to resources
- Actual impact to resources
- Number of repeated issues
- How the incident could have been prevented

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Table 4.3-1 Compliance Levels

Compliance Level, Reporting Term, and Severity	Project Definition	Examples
Non-Incident		
Level 0: Acceptable Compliant	An event or observation where the project was compliant with all project requirements.	<ul style="list-style-type: none"> • All project requirements were followed adequately. • No issues were observed.
Incident		
Level 1: Occurrence <i>At risk of being out of compliance (low severity)</i>	An event or observation that if left unaddressed has the potential to affect compliance.	<ul style="list-style-type: none"> • A low amount of trash or construction debris was observed scattered around a work site, but the trash was quickly collected and removed from the site. • A minor fluid leak (i.e., hydraulic hose break) that did not put a resource at risk, and was immediately contained and cleaned according to project requirements.
Level 2: Minor Problem <i>Out of compliance (low to moderate severity)</i>	An event or observation that slightly deviates from project requirements, but does not put a resource at unpermitted risk.	<ul style="list-style-type: none"> • Erosion controls were improperly installed or maintained at a work site, but did not result in discharge of sediment. • Project personnel used an unauthorized turnaround area or access road, but the site was previously disturbed, and the action did not put a sensitive resource at risk.
Level 3: Compliance Issue <i>Out of compliance (moderate to high severity)</i>	An event or observation that slightly deviates from project requirements and puts a resource at minor unpermitted risk, but is quickly corrected without impacting the resource.	<ul style="list-style-type: none"> • Soil or construction material was placed outside of an approved work area in a non-sensitive area, but the material was removed by the end of the day. • A fuel tank was stored overnight within specified limits of a water body without secondary containment, but did not result in the release of hazardous materials. • Project personnel used an unauthorized overland and previously undisturbed turnaround area or access road, but the action did not impact a sensitive resource.
Level 4: Noncompliance <i>Out of compliance (high severity)</i>	An event or observation that violates project requirements and puts a resource at unpermitted risk.	<ul style="list-style-type: none"> • Mobilization of equipment or materials to a work site prior to receiving NTP authorization from CPUC. • Soil or construction material was placed outside of an approved work area in an environmentally sensitive area. • Erosion control BMPs failed during a storm and sediment was discharged into a sensitive area. • Project vehicles entered a sensitive resource exclusion area and damaged a resource. • Project personnel continued to operate equipment after being requested to halt temporarily by the EI or EM.

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The need to change initially reported compliance levels may arise if the incident level was over- or under-reported. The CPUC Project Manager shall make final determinations regarding the appropriate compliance level for each incident as needed, and the CPUC Monitoring Team shall maintain a record of all incidents for the project that will be analyzed in the post-construction and final monitoring reports.

4.3.1.2 Health and Safety Incidents

PG&E and CPUC's most important responsibility is maintaining safe working conditions and protecting the public including workers from exposure to hazards related to the project. Any events (i.e., accidents or near misses/close calls) or issues observed with health and safety procedures shall be documented as an incident. PG&E and CPUC shall provide notification and prepare Incident Reports for health and safety incidents; however, health and safety incidents will not necessarily reflect negatively on PG&E's environmental compliance record unless a specific project requirement, permit, or plan requirement was violated.

4.3.1.3 Public Complaints

The public may take issue with one or more aspects of the project. MM Noise-1 includes specific requirements for processing noise complaints from the public. All other public complaints that do not relate to noise shall be documented as an incident. Public complaints may be submitted formally to PG&E or CPUC, or informally to field personnel at the project site.

PG&E may elect to work with members of the public to resolve any complaints. The CPUC Monitoring Team shall not intervene with PG&E's resolution process unless the complaint is related to specific compliance requirements or a previously unidentified impact related to CEQA review. The CPUC Project Manager shall make any final determinations regarding the necessity of corrective actions following public complaints.

Public complaints will not reflect negatively on PG&E's environmental compliance record unless a specific project requirement was violated.

4.3.2 Notification

PG&E and CPUC shall notify one another of incidents within one business day of the initial observation so the issues can be adequately addressed. Response procedures do not need to be finalized when initial notification is provided. Over time the PG&E Compliance Team and CPUC Monitoring Team may collectively agree to reduce the notification requirement for Level 1 Occurrences because, if documented correctly, these issues would be minor and inconsequential. Changes in the notification procedures for incidents must be authorized by the CPUC Project Manager.

Jurisdictional agencies may also require notification if incidents are documented that relate to their jurisdiction over the project. CPUC will determine if other agencies should be notified when incidents are documented and either contact agency representatives directly, or direct PG&E to do so and to provide documentation.

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4.3.3 Incident Reports

Incident Reports shall be prepared by the observing party (either PG&E or CPUC) and submitted to the alternate party within one business day of the observation if a Minor Problem, Compliance Issue, or Noncompliance is documented (Levels 2-4). Incidents Reports are not required if an Occurrence (Level 1) is documented. At a minimum, Incident Reports must include the following information:

- Incident Category
- Compliance Level (if applicable)
- Incident Start Date (i.e., date event began if known or initial observation date)
- Summary of Incident (i.e., description of the event or observation, personnel present, and actions taken to resolve the issue)
- Resolution Date (if known)

Incidents shall be addressed in MMCRP reports prepared by both PG&E and CPUC as described in Section 2.2.8 (e.g., daily, weekly, monthly, and post-construction reports), and Incident Reports shall be attached to the MMCRP reports for the applicable period.

In addition to Incident Reports, events rising to the level of Noncompliance may require preparation of memoranda in order to describe the event in greater detail and the corrective actions necessary to bring the project back into compliance.

4.3.4 CEQA Citation Program

The CPUC may exercise the CEQA Citation Program adopted by the CPUC in Resolution E-4550. The program delegates authority to CPUC staff to draft and issue citations and levy fines for non-compliance with CEQA requirements. The Resolution allows Commission staff to efficiently issue fines when needed to quickly address non-compliance incidents that are occurring in the field.

4.4 PROJECT CHANGES

4.4.1 Minor Project Refinements

PG&E may identify a need to refine one or more aspects of the project following CPUC's final decision due to final engineering specifications. In such cases, PG&E is required to submit Minor Project Refinement (MPR) requests to the CPUC Monitoring Team and obtain authorization from the CPUC Project Manager through the process described in this section.

Approval for MPR requests will only be granted if the proposed refinements achieve or exceed the level of environmental protection approved in the IS/MND, are consistent with CEQA requirements, and comply with the APMs and MMs identified in the IS/MND. Requests for project refinements that do not fall within the authority delegated to the CPUC Project Manager as defined in the CPUC's final decision must be sought through a Petition for Modification pursuant to Rule 16.4 of CPUC's Rules of Practice and Procedure. Proposed project refinements

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will not be authorized by the CPUC Project Manager through the MPR process if they would meet one or more of the following criteria:

- Involves modifications that would be outside the geographic boundary of the study area utilized in the IS/MND
- Would create a new significant impact or substantial increase the severity of a previously identified significant impact, based on the thresholds used in the IS/MND
- Trigger additional permit requirements that are not defined in the IS/MND or MMCRP
- Conflict with any APM or MM, or any applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy
- Require new conditions for approval, without which the modifications would result in a new significant impact or substantially increase the severity of a previously identified significant impact

At a minimum, MPR requests must include the following information:

- MPR request number
- Date submitted to CPUC
- Requested approval date
- Anticipated start and end date for the proposed actions associated with the refinements
- A detailed description of the proposed refinements, including an explanation of why the refinements are necessary
- A summary list of applicable project requirements (e.g., APMs, MMs, project parameters, or other project stipulations) for which the refinements are being requested
- Supporting photos, maps, and other documentation illustrating the difference between the existing conditions in the area, the approved project, and the proposed refinements
- The dimensions and area of any additional work areas and land disturbance associated with the proposed refinements
- A detailed description of potential impacts of the proposed refinements, including a discussion of each environmental issue area that could be affected by the refinements with accompanying verification that there will be no increase in significant impacts to resources affected by the project and no new significant impacts, after application of previously adopted mitigation
- A summary of water feature and stormwater considerations including any changes to jurisdictional features and the use of erosion and sediment control BMPs
- A statement describing if the proposed refinements would conflict with any APM, MM, applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy
- Evidence of PG&E's consultation with applicable agencies and any Native American tribes, to the extent applicable

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The CPUC Monitoring Team shall review MPR requests to ensure the proposed refinements are consistent with the IS/MND and final CPUC decision. The CPUC Monitoring Team may request additional information during the MPR review process as needed. If it is determined that the MPR request includes sufficient evidence that the proposed refinements are necessary, there are no environmentally preferable alternatives to the refinements, and the refinements would not meet one or more of the exclusionary triggers, then the CPUC Project Manager would authorize the refinements by issuing a MPR Authorization Letter at their discretion. MPR Authorization Letters will address any conditions of approval, and include applicable documentation as necessary.

Examples of potential MPRs, depending on their location, may include the following:

- Adding a temporary extra work area for no more than 60 days of use if the proposed location is in a previously disturbed area with no adjacent sensitive resources or land uses
- Substituting or replacing a previously authorized work area with an alternate work area that is in a previously disturbed area with no adjacent sensitive resources or land uses
- Adjusting the alignment of a project to avoid unanticipated impacts related to cultural artifacts, buried utility infrastructure, hazardous and toxic substances, and other land use impacts including effects on homeowners, so long as the adjustment does not create a new significant impact or a substantial increase in the severity of a previously identified significant impact
- Adjusting the alignment of a project to avoid or adapt to conditions on the ground that vary from the conditions that existed at the time of the original environmental analysis, so long as the adjustment does not create a new significant impact or a substantial increase in the severity of a previously identified significant impact

4.4.2 Temporary Extra Workspace

For the purposes of this MMCRP, TEWS is defined as a preexisting developed space (e.g., no site preparation is required) that would be used by PG&E during construction for a period of up to 60 days, and that was not specifically identified and evaluated during the CEQA process. Additional workspace requests that would be used for more than 60 days must be processed as a MPR (refer to Section 4.4.1). If PG&E determines a need for a construction TEWS, it must submit such a request to the CPUC, consistent with the communication protocol. PG&E will not be permitted to use a TEWS prior to receiving written authorization from the CPUC.

PG&E must demonstrate that:

- The TEWS is located in a disturbed area with no sensitive resources or land uses onsite or within proximity of the proposed work space such that they may be significantly impacted by the work,
- PG&E has the permission of the applicable landowner (e.g., municipality or private) to use the work space, and
- Use of the TEWS will not result in any new significant environmental impacts.

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Following is a list of the specific information that PG&E will be required to submit with its TEWS request (see Appendix E for form):

- Date of request
- Location of the TEWS (detailed description, including maps if required)
- Property owner of TEWS
- An explanation of the need for the TEWS
- An analysis that demonstrates no new significant impacts will result from use of the TEWS including: compaction contributing to runoff rates or other stormwater/watershed effects; observed existing impacts to the site, such as the presence of potentially hazardous or polluting substances that could pose a risk to Project personnel or the public; abandoned vehicles, equipment, or other materials; or other sensitive resources
- Biological and botanical surveys if appropriate
- Cultural resource survey if appropriate
- Duration and dates of expected use of the TEWS
- Details of the expected condition of the site after use

4.5 STOP WORK ORDERS

When it is safe to do so, any member of the PG&E Compliance Team or CPUC Monitoring Team has the authority to issue Stop Work Orders to temporarily halt or redirect project activities if a sensitive resource is put in undue risk beyond previously authorized or permitted levels. In addition, the CPUC Monitoring Team may also stop or redirect work if unauthorized project activities are observed, such as use of a work area that has not been approved or if substantial issues remain unresolved. The CPUC Project Manager will make any final determinations regarding Stop Work Orders for the project.

5 RECORDS MANAGEMENT

5.1.1 Tracking Systems

5.1.1.1 Requirements

The CPUC Monitoring Team will track the status and completion of key project requirements using the following matrix tracking tables located in Appendix C:

- Table C-1: Permits and Authorizations Tracking
- Table C-2: Plans Tracking
- Table C-3: Notifications Tracking

The CPUC Monitoring Team and PG&E Compliance Team shall use these tables to communicate status updates and the completion of the listed requirements during the NTP process. The dates and descriptions added to the matrix tracking tables shall be supported by referenced documentation, as specified in the requirement sources (e.g., APMs, MMs, permits, plans, etc.).

Compliance with repetitious requirements that would be implemented throughout construction (e.g., wildlife clearances, field monitoring, avoidance and minimization activities) shall be documented in the daily and weekly reports prepared by PG&E and the CPUC (refer to Section 2.2.8).

5.1.1.2 Requests and Authorizations

CPUC will track the dates and criteria of important requests and authorizations for the project (e.g., NTPs, MPRs, and TEWS) as part of the Monthly Monitoring Summary Report.

5.1.1.3 Incidents

A summary of any incidents will also be tracked as part of the Monthly Monitoring Summary Report, and the CPUC Monitoring Team will maintain a master table of incidents that will be evaluated in the Final Monitoring Report (refer to Section 2.2.8).

5.1.1.4 Supporting Documentation

The CPUC Monitoring Team shall maintain records of all reports, memoranda, and other supporting documentation that are used to verify compliance. These records will be attached to the Monthly Mitigation Monitoring Reports or the Final Mitigation Monitoring Report, unless otherwise determined confidential by the CPUC Project Manager.

5 RECORDS TRACKING AND MANAGEMENT

5.1.2 Public Access to Records

The public is allowed access to records used to monitor and track compliance with project requirements. Such records will be made available to the public upon request unless the records are confidential. In order to facilitate public awareness, the MMCRP will be posted on the project website:

<http://www.cpuc.ca.gov/environment/info/panoramaenv/Fulton-Fitch/Fulton-Fitch.html>

If determined necessary by the CPUC Project Manager, Monthly Monitoring Summary Reports will also be posted on the project website during construction.

APPENDIX A PROJECT DETAIL MAPS

APPENDIX B FINAL APMS AND MMS

APPENDIX C SUMMARY TRACKING TABLES

APPENDIX D PROJECT PERSONNEL AND CONTACT
INFORMATION (*CONFIDENTIAL*)

APPENDIX E FORMS
