

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 22, 2018

Mr. David Thomas
245 Market Street, Room 1054D
San Francisco, CA 94105

RE: Notice to Proceed #3 for the Fulton-Fitch Mountain Reconductoring Project

Dear Mr. Thomas,

Pursuant to the California Environmental Quality Act (CEQA), the California Public Utilities Commission (CPUC) prepared an Initial Study/Mitigated Negative Declaration (IS/MND) for Pacific Gas and Electric Company's (PG&E's) Fulton-Fitch Mountain Reconductoring Project (A. 15-12-005). On December 18, 2017, the CPUC issued a decision to adopt the Final IS/MND and grant PG&E a Permit to Construct the project (D.17-12-012). The CPUC adopted the mitigation measures (MMs) and applicant proposed measures (APMs) identified in the IS/MND as conditions of project approval, as well as a Mitigation Monitoring and Reporting Program (MMRP) to ensure compliance with the MMs and APMs pursuant to Public Resources Code § 21081.6 and § 15097 of the CEQA Guidelines (Section 4 of the Final IS/MND).

A detailed Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP) was developed for the project with direct participation with PG&E staff. The MMCRP defines specific procedures that are part of the adopted program including the Notice to Proceed (NTP) process, which requires PG&E to obtain approval from the CPUC prior to initiating specific actions covered by the CPUC's decision on the project. The purpose of the NTP process is to ensure all pre-construction phase requirements are completed and the proposed actions are consistent with the approved project as specified in the Final IS/MND. Any deviation from the approved project must be authorized by the CPUC through the Minor Project Refinement (MPR) process defined in the MMCRP or the CPUC's Petition for Modification process (CPUC Rule 16.4).

On August 13, 2018, PG&E submitted NTP #3 requesting CPUC authorization to begin all remaining project activities in the Northern Segment of the project, as described in the Final IS/MND. A copy of the NTP request materials is enclosed as Attachment 1.

This letter serves to inform you that the CPUC has reviewed and approved PG&E's request for NTP #3 with standard and specific conditions. These conditions are identified in the last section of this letter. The results of the CPUC's review of NTP #3 and the status of applicable pre-construction requirements are provided in Attachment 2, which include updated requirement summary tables from the MMCRP.

Actions that have been reviewed and approved in this NTP are summarized below. Actions described in the Final IS/MND yet to be requested and actions pending CPUC review and approval are also identified for clarity.

Actions Reviewed and Approved in NTP #3

This NTP authorizes PG&E to initiate all project activities described in the Final IS/MND for Pull Site (PS)-6, PS-7, PS-9, Helicopter Landing Zone (LZ)-4, Poles 23-61, and associated access roads. Actions that were reviewed and authorized in this NTP include:

- Clearing vegetation and grading, installing gravel, and installing water crossings
- Installing erosion controls and sediment controls
- Installing construction fencing and trailers
- Storing vehicles, materials, and equipment
- Helicopter landing and transport operations
- Removing and installing conductor and poles

Actions Reviewed and Approved in Previous NTPs

The CPUC's approval of NTP #1 authorized initial site development and staging area activities at LZ-3 and LZ-5, including the associated access roads. The CPUC's approval of NTP #2 authorized all project activities described in the IS/MND for Fitch Mountain Substation, LZ-6, PS-10, PS-12, Poles 62-109, and the TAP Staging Area (SA), as well as all associated access roads.

Actions Pending Review and Approval

PG&E must submit requests and obtain approval from the CPUC prior to initiating all other actions or working in additional areas that are not described above or otherwise authorized through the MPR process. Actions described in the IS/MND that have not been authorized include:

- Project activities associated with any staging areas other than TAP SA, SA-5, LZ-3, LZ-4, LZ-5, and LZ-6
- Project activities associated with Poles 1-22 or the Southern Segment
- Project activities associated with any pull sites other than PS-6, PS-7, PS-9, PS-10 and PS-12
- Use of any access roads that are not identified in the Final IS/MND or an approved MPR

Conditions of Approval

This NTP is approved with the following standard conditions:

1. PG&E shall comply with all APMs and MMs identified in the Final IS/MND; CPUC-approved plans; and other agency authorizations and permits.
2. PG&E shall comply with the adopted MMRP and project-specific procedures identified in the MMCRP.
3. PG&E shall not deviate from the CPUC-approved project as defined in the Final IS/MND or otherwise authorized by CPUC through additional CEQA review or the MPR process defined in the MMCRP.
4. PG&E shall obtain an NTP from CPUC prior to initiating any actions that are not specifically authorized in this or previous NTPs.

This NTP is also approved with the following specific conditions:

5. **FAA Congested Area Plan for External Helicopter Loads.** PG&E shall provide CPUC with an FAA-approved plan prior to conducting any helicopter activity in congested areas.
6. **Construction Activities within Parks.** PG&E shall post signs at park and trail entrances at least 1 week in advance of parks or trail closures, and coordinate with county officials regarding park and trail closures and detours at least 90 days prior to such closures.
7. **Pending Surveys and Response.** Immediately prior to initiating work activities at each project site, PG&E shall conduct remaining pre-construction surveys and clearances, as specified in applicable APMs and MMs. Pending pre-construction surveys are required for the following resources (refer to Table 4 in Attachment 2):
 - a. California tiger salamander
 - b. American badger
 - c. Western pond turtle
 - d. California red-legged frog (CRLF)
 - e. Foothill yellow-legged frog (FYLF)
 - f. Nesting birds
 - g. Special-status and protected bats. An acoustic emergence survey must be completed, and the results reported to CPUC, prior to impacting suitable roosts during the breeding season.
 - h. Vegetation infected with Sudden Oak Death
8. **Pre-Project Trail Conditions Report and Access in Regional Parks.** Three trails identified in the Pre-Project Trail Conditions Report have not been approved as access routes, including access routes along Big Leaf Trail in Shiloh Ranch Regional Park, and Peeler Post Trail and Three Lakes Trail in Foothill Regional Park. PG&E must obtain approval from CPUC prior to using these trails as access routes through the MPR process. PG&E must also amend the Pre-Project Trail Conditions Report if access routes are proposed on any additional trails in regional parks other than those specifically addressed in the approved report.
9. **Geotechnical Investigation Report.** Prior to pole replacement, PG&E shall provide written confirmation that applicable pole recommendations to address geohazards identified in the geotechnical investigation report (Kleinfelder 2017 and 2018) were incorporated into the final project designs. If grading becomes necessary within a documented landslide risk area identified in the report, additional geotechnical review must be conducted prior to grading. In such cases, PG&E must provide a letter from a geotechnical engineer that either (1) states the project would not increase the risk of landslides as a result of grading activities; or (2) recommends site-specific methods to adequately address such risks. Any recommendations must be incorporated into the final grading plans that would be submitted to the County for a grading permit.

Mr. David Thomas

August 22, 2018

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Please direct any questions related to this NTP to me at 415-703-1966 or lisa.orsaba@cpuc.ca.gov.

Sincerely,



Lisa Orsaba
Project Manager
Energy Division, CEQA Unit

cc: Jo Lynn Lambert, PG&E Attorney
Aaron Lui, Project Manager, Panorama Environmental, Inc.

Attachment 1: PG&E Requests for NTP #3

Attachment 2: CPUC Review of Pre-Construction Requirements for NTP #3

Attachment 1: PG&E Requests for NTP #3

8/13/2018

Lonn Maier/Lisa Orsaba
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

**Subject: Fulton-Fitch Mountain 60kV Reconductoring Project
Notice to Proceed Request No.3 (NTP #3) – PS-6, PS-7, PS-9, LZ-4, and Poles 23-61**

Dear Mr. Maier/Ms. Orsaba,

On December 18, 2017, the California Public Utilities Commission (CPUC) issued Decision D1712012, granting Pacific Gas and Electric Company (PG&E) a Permit to Construct the Fulton-Fitch Mountain 60kV Reconductoring Project (project) (Application A.15-12-005) pursuant to General Order 131-D. The CPUC Decision adopted the Final Mitigated Negative Declaration (MND), released in October 2017, in its entirety. The Final MND includes a Mitigation Monitoring, Compliance and Reporting Plan (MMCRP), and the CPUC adopted the MMCRP as part of its approval of the project.

NTP Request Number:	3
Date Submitted to CPUC:	August 13, 2018
Requested Approval Date:	September 1, 2018
Anticipated Start/End Date for Proposed Actions:	This NTP request is for work at PS-6, PS-7, PS-9, LZ-4, Poles 23-61, and associated access routes, scheduled to commence on September 1, 2018. The remaining work scheduled to commence will be addressed in a separate NTP request.

Description of the proposed actions requested in the NTP:
PG&E requests that the CPUC issue a Notice to Proceed (NTP #3) for PS-6, PS-7, PS-9, LZ-4, Poles 23-61, and associated access routes. The work area is shown in map sets attached to the previously submitted frog report, vegetation report, and watercourse crossing. Proposed new access routes are included in MPRs #4, #5 and #6, which were submitted on August 3, 2018. Table C-2 from the MMRP is provided as Attachment 1, providing an update on delivery of plans required in the Final ISMND.
Summary of previously authorized actions (if applicable) as detailed in NTP Authorization Letters:
NTP Authorization Letter #1, Staging Areas LZ-3 (Shiloh Road) and LZ-5 (Windsor Oaks), approved June 18, 2018. NTP Authorization Letter #2, Fitch Substation, TAP Staging Area, LZ-6, PS-12, PS-10, Poles 62-109, and associated access routes, approved July 20, 2018.
Summary of actions that have not been proposed or authorized that must be included with future NTP requests:
Replace 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; replace poles along 8 miles of the Fulton-Hopland line, and make modifications to Fitch Mountain Substation.

Summary of outstanding requirements and documentation not included with the NTP package, and the anticipated dates it will be provided:

See Attachment 1: Preconstruction Tracking Tables.

Minor Project Refinements or Temporary Extra Workspace related to the proposed actions:

Minor Project Refinements (MPR) #4, #5, and #6 were submitted on August 3, 2018. A summary of the MPRs is provided below.

MPR 4: This minor project refinement form serves as a request from PG&E to use alternate routes to access Pole Locations 27-28. PG&E proposes to use an existing fire road to access pole locations 27-28, rather than the permitted route, which is not a County approved trail. As the proposed route is an established fire road, there would be minimal vegetation trimming and minimal improvements to the road.

MPR 5: This minor project refinement form serves as a request from PG&E to use an alternate route to access Pole Location 68. Permitted access traverses down a steep hillside not safe for vehicle travel. The proposed route is along a less steep area which will allow a track vehicle to access. Both routes are on the same property, and the property manager prefers the proposed route.

MPR 6: This minor project refinement serves as a request from PG&E to mow the 15' x 75' area (no graveling or grading) along the access route to LZ-6 and PS-12 to be used as a pull-out for vehicles. The pullout is located at 38.606674, -122.840438. The project would be using the area to allow large haul trucks and line trucks to get safely off the access road and allow other traffic to get past.

List of Attachments:

Attachment 1: Preconstruction Tracking Tables

FULTON-FITCH MOUNTAIN RECONDUCTING PROJECT

Review of Pre-construction Requirements for NTP #3

Updated: August 8, 2018

REQUIREMENT TRACKING TABLES

Table 1 Permits and Authorizations Tracking

Permit/Authorization	Purpose and Authority	Requirement Sources	Timing and Submittal Requirements	Review/Coordination ^a		Status
				Submitted	Approved	
Required Prior to All Construction Activities						
CPUC Permit to Construct (PTC)	CPUC authorization to construct the project <i>CPUC General Order (GO) 131-D, Section III.B</i>	MMCRP	PG&E obtained a PTC from CPUC (as issued through the CPUC Proceeding Decision).	CPUC: 12/3/15	CPUC: 12/14/17; 4/26/18	Complete On 1/12/18, PG&E submitted an Application for Rehearing of the Decision to address language in the CPUC's original decision regarding GO 95. PG&E's application was denied, and the original Decision was amended.
			*PG&E shall submit any requests for Minor Project Refinements (MPRs) or Petition for Modifications (PFMs), as needed, prior to deviating from the CPUC-approved project.	CPUC: Ongoing	CPUC: Ongoing	Ongoing MPR #1 (Staging Area LZ-5); approved with NTP #1 MPR #2 (access road to LZ-3); denied MPR #3 (TAP Staging Area); approved with NTP #2 MPR #4 (Shiloh Park); pending review MPR #5 (Access to Pole 68); pending review MPR #6 (Access from Minaglia Road); pending review
State Water Resources Control Board (SWRCB) General Permit	Permit for discharging stormwater associated with construction and land disturbance activities of one acre or more <i>Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ</i> The General NPDES Permit requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) (refer to Table C-2)	MM Hydrology-1: SWPPP Development and Implementation MM Hydrology-2: SWPPP Monitoring Program	PG&E shall submit Permit Registration Documents (PRDs) (e.g., Notice of Intent [NOI], etc.) once obtained from the SWRCB.	SWRCB: 5/21/18 CPUC: 5/8/18	SWRCB: 5/22/18 CPUC: 6/11/18	Complete
			PG&E shall submit all Notice of Termination (NOT) forms to CPUC once SWPPP requirements have been met and permit coverage has ended.	SWRCB: Pending CPUC: Pending	SWRCB: Pending CPUC: Pending	Pending The pending requirements are not applicable to NTP #3.
Required Prior to Specific Construction Activities						
Federal Aviation Administration (FAA) Notice of Proposed Construction or Alteration	Regulations apply to poles and conductor over 200 feet in height above ground level or within certain proximities to local airports <i>Federal Aviation Regulations (FAR) and Code of Federal Regulations (CFR) Part 77</i>	Consistency with impact analysis in IS/MND	An initial Notice (Form 7460) and FAA determination were completed; however, a revised notice must be submitted within 45 days of construction. PG&E shall submit a final Notice to FAA and provide a copy of the Notice and FAA determination to CPUC once obtained.	FAA: 2/6/18 CPUC: 2/8/16	FAA: 2/6/18 CPUC: 2/8/16	Partially Complete FAA determination of no hazard is complete for the poles identified in the Final IS/MND. Filing of FAA Form 7460-2, Part 2 pending (due within 5 days after construction reaches its greatest height). Additional FAA notification would be required if major pole changes occur. These pending requirements are not applicable to NTP #3.
FAA Congested Area Plan for External Helicopter Loads	Regulations for carrying external helicopter loads in congested areas (e.g., residential areas) <i>Title 14 Code of Federal Regulations (CFR) Part 133</i>	MM Traffic-2: Overhead Construction Safety	PG&E shall submit the Plan for FAA approval prior to conducting helicopter activity in congested areas and submit a copy of the approved plan to CPUC.	FAA: Pending CPUC: Pending	FAA: Pending CPUC: N/A	Pending These pending requirements are not applicable to NTP #3.

REQUIREMENT TRACKING TABLES

California Department of Transportation (Caltrans) Standard Encroachment Permit

Use of California state highways for purposes other than normal transportation, including construction activities completed within the Caltrans right-of-way (ROW)
Section 660 of the California Streets and Highways Code

MM Traffic-1: Construction Traffic Management
 MM Traffic-3: Roadway Damage

PG&E shall acquire the permit and provide a copy to CPUC **prior to work within the US 101 ROW.**

Caltrans: Pending
CPUC: Pending

Caltrans: Pending
CPUC: Pending

Pending
 These pending requirements are not applicable to NTP #3.

REQUIREMENT TRACKING TABLES

Permit/Authorization	Purpose and Authority	Requirement Sources	Timing and Submittal Requirements	Review/Coordination ^a		Status
				Submitted	Approved	
Caltrans Transportation Permit	Movement of oversized or excessive load vehicles on the state transportation network <i>California Vehicle Code</i>	MM Traffic-1: Construction Traffic Management MM Traffic-3: Roadway Damage	PG&E shall acquire the permit and provide a copy to CPUC prior to transportation of oversized equipment on the state transportation network.	Caltrans: Pending CPUC: Pending	Caltrans: Pending CPUC: N/A	Pending – Condition of Approval #6
Sonoma County Building Permit	Constructing structures associated with the Fitch Mountain Substation <i>Sonoma County Code of Ordinances, Chapter 7 Building Regulations, Section 7-5</i>	MMCRP	PG&E shall acquire the permit and provide copy to CPUC prior to constructing the Fitch Mountain Substation.	County: Pending CPUC: Pending	County: Pending CPUC: N/A	Pending
Sonoma County Encroachment Permit	Construction activities within Sonoma County roadways not covered by existing franchise agreements <i>Sonoma County Code of Ordinances, Chapter 7 Building Regulations, Article III</i>	MM Traffic-1: Construction Traffic Management MM Traffic-3: Roadway Damage	PG&E shall acquire the permit and provide a copy to CPUC prior to work within County roadways.	County: Pending CPUC: Pending	County: Pending CPUC: N/A	Pending
Sonoma County Transportation Permit	Movement of oversized or excessive load vehicles on the County transportation network <i>Sonoma County Code of Ordinances, Chapter 15 Highways, Roads and Bridges, Article II</i>	MM Traffic-1: Construction Traffic Management MM Traffic-3: Roadway Damage	PG&E shall acquire the permit and provide a copy to CPUC prior to transportation of oversized equipment on the County transportation network.	County: Pending CPUC: Pending	County: Pending CPUC: N/A	Civil Contractor – Complete Tower/Line Contractor - Pending
Required Following Specific Discoveries/Determinations						
*United States (U.S.) Army Corps of Engineers (USACE) Section 404 Nationwide Permit	Work in waters of the U.S., including wetlands <i>Section 404 of the Clean Water Act</i>	MM Biology-11: Wetland Mitigation MM Hydrology-4: Watercourse Avoidance and Crossing Plan	*PG&E shall acquire a permit and provide a copy to CPUC prior to impacting waters of the U.S., including wetlands.	*USACE: TBD *CPUC: TBD	*USACE: TBD *CPUC: N/A	TBD These potential requirements are not applicable to NTP #3.
*U.S. Fish and Wildlife Service (USFWS) Section 10 Incidental Take Permit	Regulates impacts on federally-listed, threatened, or endangered plants and animals, and the habitats upon which they depend. <i>Section 10 of the Endangered Species Act</i>	AMP BIO-7: California Tiger Salamander MM Biology-2: Special-status Plants MM Biology-3: California Red-legged Frog	*PG&E shall acquire permits and provide copies to CPUC prior to any incidental take of federally-listed species or federally-protected habitat.	*USACE: TBD *CPUC: TBD	*USFWS: TBD *CPUC: N/A	TBD No special-status species have been identified in project areas to date. PG&E would be required to obtain the necessary permits if special-status species are discovered during pre-construction surveys or during construction clearances. PG&E’s Bay Area Habitat Conservation Plan completed in December 2017 would be applied for select species covered by the plan, including California red-legged frog. These potential requirements are not applicable to NTP #3.

REQUIREMENT TRACKING TABLES

*RWQCB Section 401 Water Quality Certification

Consistency with state water quality standards, prior to issuance of a USACE Section 404 Permit.
Section 401 of the Clean Water Act

MM Biology-11: Wetland Mitigation
MM Hydrology-4: Watercourse Avoidance and Crossing Plan

*PG&E shall obtain a 401 Permit prior to obtaining a Section 404 Permit from USACE, and provide a copy of the permits to CPUC **prior to impacting waters of the U.S.**

*RWQCB: TBD
*CPUC: TBD

*RWQCB: TBD
*CPUC: N/A

TBD
These potential requirements are not applicable to NTP #3.

REQUIREMENT TRACKING TABLES

Permit/Authorization	Purpose and Authority	Requirement Sources	Timing and Submittal Requirements	Review/Coordination ^a		Status
				Submitted	Approved	
*California Department of Fish and Wildlife (CDFW) Lake and Streambed Alteration Agreement	Regulates activities that affect waters of the state, including the bed or bank of such features <i>Fish and Game Code Section 1602</i>	MM Hydrology-4: Watercourse Avoidance and Crossing Plan	*PG&E shall acquire any permit and provide a copy to CPUC prior to impacting waters of the state.	*CDFW: TBD *CPUC: TBD	*CDFW: TBD *CPUC: N/A	TBD These potential requirements are not applicable to NTP #3.
*CDFW Section 2081(b) Incidental Take Permits or Consistency Determination	Impacts on state-listed, threatened, or endangered species, and the habitats upon which they depend <i>Fish and Game Code Section 2081(b)</i>	AMP BIO-7: California Tiger Salamander APM BIO-8: American Badger APM BIO-9: Western Pond Turtle MM Biology-2: Special-status Plants MM Biology-4: Foothill Yellow-legged Frog	*PG&E shall acquire any permits and provide copies to CPUC prior to any incidental take of state-listed species or state-protected habitat.	*CDFW: TBD *CPUC: TBD	*CDFW: TBD *CPUC: N/A	TBD No special-status species have been identified in project areas to date. PG&E would be required to obtain the necessary permits if special-status species are discovered during pre-construction surveys or during construction clearances. These potential requirements are not applicable to NTP #3.
*Sonoma County culvert design approval	Requirements regarding the design of culverts that could impede flood water <i>Sonoma County Flood Control Design Criteria</i>	MM Hydrology-5: Culvert Design	PG&E shall acquire the permit and provide a copy to CPUC prior to modifying or installing culverts.	*County: Pending *CPUC: Pending	*County: Pending *CPUC: N/A	TBD *PG&E no longer anticipates a need for culvert installation or replacement.

Notes:

^a All project permits, and authorizations provided by other agencies, must be submitted to CPUC. CPUC reserves the right to review and comment on the accuracy and adequacy of project permits and authorizations, if necessary.

* Requirements marked with an asterisk are only applicable under specified conditions.

Table 2 Plans Tracking

Plan	Requirement Sources	Timing and Submittal Requirements	Review/Coordination ^a		Status
			Submitted	Approved	
Required Prior to All Construction Activities					
Worker Environmental Awareness Program (WEAP) Training Materials (also referred to as the Environmental Training Program [ETP])	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	PG&E shall submit all ETP materials to CPUC for review and approval no less than 30 days before construction.	CPUC: 5/30/18	CPUC: 6/8/18	Complete Tracking # WT-01.2

REQUIREMENT TRACKING TABLES

Plan	Requirement Sources	Timing and Submittal Requirements	Review/Coordination ^a		Status
			Submitted	Approved	
Revegetation, Restoration, and Monitoring Plan	MM Biology-7: Revegetation, Restoration, and Monitoring Plan	PG&E shall submit the plan to the CPUC for review and approval no less than 60 days before construction.	CPUC: 3/5/18	CPUC: 6/13/18	Complete Tracking # P-01.2
Stormwater Pollution Prevention Plan (SWPPP)	MM Hazards-1: Hazardous Materials Procedures and Worker Training MM Hydrology-1: SWPPP Development and Implementation MM Hydrology-2: SWPPP Monitoring Program	A Qualified SWPPP Developer (QSD) shall prepare a SWPPP for the project in accordance with the SWRCB General Permit (refer to Table C-1). PG&E shall submit the SWPPP to the CPUC for review and comment no less than 30 days prior to construction.	CPUC: 5/8/18	CPUC: 6/11/18	Complete Tracking # P-04.3 Final PRDs for the Construction General Permit must also be submitted to CPUC once the plan is finalized (refer to Table 1).
Required Prior to Specific Construction Activities					
Construction Fire Prevention Plan	MM Hazards-2: Construction Fire Prevention Plan	PG&E shall submit the plan to CPUC for review and approval at least 30 days prior to construction within the Northern Segment.	CPUC: 4/20/18	CPUC: 6/14/18	Complete Tracking # P-02.3
Watercourse Avoidance and Crossing Plan	MM Biology-11: Wetland Mitigation MM Hydrology-1: SWPPP Development and Implementation MM Hydrology-4: Watercourse Avoidance and Crossing Plan	PG&E shall prepare a Seasonal Watercourse Avoidance and Crossing Plan and submit the plan to the CPUC no less than 60 days prior to use or construction of surface water crossings or work within 50 feet of surface water resources.	CPUC: 4/20/18	CPUC: 7/19/2018	Complete Tracking # P-03.2

Notes:

^a All project Plans required by other agencies must be submitted to CPUC. CPUC reserves the right to review and comment on the accuracy and adequacy of all project Plans, if necessary.

* Requirements marked with an asterisk are only applicable under specified conditions.

Table 3 Notifications Tracking

Notification	Entities to Notify	Requirement Sources	Timing and Submittal Requirements	Review/Coordination ^a		Status
				Submitted	Approved	
Required Prior to All Construction Activities						
Post signs with dust complaint information	Public	APM AIR-1: Fugitive Dust Emissions MM Noise-1: General Construction Noise	PG&E shall install a publicly visible sign at work areas where grading/blading and helicopter activities occur near public and residential areas prior to grading/blading and helicopter activities.	CPUC: 1/24/18	CPUC: 1/24/18	Partially Complete The draft signs were approved by CPUC. Signs must be posted immediately prior to the initiation of work within 500 feet

REQUIREMENT TRACKING TABLES

Notification	Entities to Notify	Requirement Sources	Timing and Submittal Requirements	Review/Coordination ^a		
				Submitted	Approved	Status
Required Prior to Specific Construction Activities						
General construction noise disturbance	All noise-sensitive receptors within 500 feet of work areas	MM Noise-1: General Construction Noise	Noise-sensitive receptors within 500 feet of work areas shall be provided written notice at least 7 days prior to beginning construction.	CPUC: 5/17/18	CPUC: 5/17/18	Complete Tracking # N-01.1; notification letters sent 5/18/18
Helicopter noise disturbance	School administrators for Mark West Elementary School and San Miguel Elementary School	MM Noise-2: Schools	Prior to helicopter activities within 500 feet of schools , PG&E shall coordinate with school administrators to determine the schedule for noise-sensitive periods that must be avoided during helicopter operation within 500 feet.	CPUC: Pending	CPUC: N/A	Pending These pending requirements are not applicable to NTP #3.
Helicopter noise disturbance	All noise-sensitive receptors within 500 feet of any location where helicopter activity will occur	MM Noise-3: Helicopter Activities	Noise-sensitive receptors within 500 feet from any location where helicopter activities may occur, including flight paths if applicable, shall be provided written notice at least 30 days prior to beginning helicopter activities.	CPUC: 5/17/18	CPUC: 5/17/18	Complete Tracking # N-01.1; notification letters sent 5/18/18
Construction activities within parks	Sonoma County park officials and park users for Maddux Ranch Regional Park, Shiloh Ranch Regional Park, and Foothill Regional Park	APM REC-1: Coordination with Park Management and Signage MM Recreation-2: Trail Detours and Notifications	PG&E shall post signs at park and trail entrances at least 1 week in advance of parks or trail closures. PG&E shall coordinate with county officials regarding park and trail closures and detours at least 90 days prior to such closures.	County: Pending CPUC: Pending	County: Pending CPUC: N/A	Pending
Emergency access disruption	Local emergency service providers (i.e., local fire districts, law enforcement offices, hospitals, and ambulance and paramedic services)	MM Traffic-4: Emergency Access	PG&E shall notify local emergency service providers no less than 1 week before construction activities.	Emergency Services: Pending CPUC: Pending	Emergency Services: N/A CPUC: N/A	Pending These pending requirements are not applicable to NTP #3.
Affected public transit routes and stops	Sonoma County Transit (SCT)	MM Traffic-5: Public Transit	PG&E shall notify SCT no less than 30 days before construction in the Southern Segment and identify roadway segments where bus routes and bus stops are located that may be affected during construction.	SCT: Pending CPUC: Pending	SCT: N/A CPUC: N/A	Pending These pending requirements are not applicable to NTP #3.

Notes:

^a Notifications and documentation required by other agencies must also be submitted to CPUC. CPUC reserves the right to review and comment on the accuracy and adequacy of notification materials, if necessary.

* Requirements marked with an asterisk are only applicable under specified conditions.

REQUIREMENT TRACKING TABLES

Table 4 Pre-construction Survey Tracking

Resource/Topic	Requirement Sources	Status
California tiger salamander	APM BIO-7: California Tiger Salamander Santa Rosa Plain Conservation Strategy (SRPCS)	Pre-construction wildlife surveys are required immediately prior to work activities. The results of these surveys must be reported to CPUC within 24 hours of completion.
American badger	APM BIO-8: American Badger	
Western pond turtle	APM BIO-9: Western Pond Turtle	
Special-status plants	MM Biology-2: Special-status Plants	Surveys for special-status plants were completed in 2016 and 2017.
California red-legged frog (CRLF)	MM Biology-3: California Red-legged Frog	Suitable habitat for CRLF and FYLF was mapped within 500 feet of work areas identified in NTP #2. Pre-construction wildlife surveys are required immediately prior to work activities. The results of these surveys must be reported to CPUC within 24 hours of completion.
Foothill yellow-legged frog (FYLF)	MM Biology-4: Foothill Yellow-legged Frog	
Nesting birds	MM Biology-5: Special-status and Protected Migratory Birds	Pre-construction nesting bird surveys are required immediately prior to work activities. The results of these surveys must be reported to CPUC within 24 hours of completion.
Special-status and protected bats	MM Biology-6: Special-status and Protected Bats	PG&E completed the required bat habitat assessment for suitable roosts within 50 feet of project areas (Tracking # S-02.2). An acoustic emergence survey must be completed, and the results reported to CPUC, prior to impacting suitable roosts during the breeding season.
Temporarily disturbed areas	MM Biology-7: Revegetation, Restoration, and Monitoring Plan	

REQUIREMENT TRACKING TABLES

Resource/Topic	Requirement Sources	Status
Sensitive plant communities	MM Biology-9: Sensitive Natural Plant Communities	A pre-construction vegetation memo was submitted with the request for NTP #1 as required. No sensitive natural plant communities were identified in areas identified in NTP #1. No additional actions are required for NTP #1; however, additional actions are required for future NTPs.
Vegetation infected with Sudden Oak Death	MM Biology-10: Sudden Oak Death Procedures	All work areas must be inspected for signs of infected vegetation prior to construction.
Cultural resources ^a	MM Cultural-3: Pre-Construction Cultural and Tribal Cultural Resource Surveys	Complete The work areas identified in NTP #3 are within the cultural survey area shown in the Final IS/MND and the Cultural Survey Memo submitted with MPR #4. No resources were identified in these areas.
Geotechnical investigation	APM GS-3: Site-specific Geotechnical Investigation MM Geology-1: Geotechnical Investigation Report	Pending Geotech Confirmation Letter These pending requirements are not applicable to NTP #3.
<p>Notes:</p> <p>^a Cultural surveys were completed for all preliminary work areas identified in the IS/MND, and for a large portion of the IS/MND study area where work areas could be relocated. Cultural survey areas are shown on Figure E-1 of the Final IS/MND. Additional cultural surveys are only required if work areas or access roads are relocated to areas that were not previously surveyed, including those within the IS/MND study area.</p>		

REQUIREMENT TRACKING TABLES

Table 5 Pre-construction Report Tracking

Report	Preparation/Submittal Frequency	Requirement Sources ^a	Contents	Status
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.	Complete The work areas identified in NTP #3 were surveyed for special-status plants in 2016 and 2017. A survey report was provided on February 12, 2018.
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.	Complete All work areas in this request are included in the report approved July 19, 2018 (Tracking # S-04.1)

REQUIREMENT TRACKING TABLES

Report	Preparation/Submittal Frequency	Requirement Sources ^a	Contents	Status
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.	Pending
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.	Pending Geotech Confirmation Letter

Attachment 2: CPUC Review of Pre-Construction Requirements for NTP #3

FULTON-FITCH MOUNTAIN RECONDUCTORING PROJECT

Review of Pre-construction Requirements for NTP #3

Updated: August 22, 2018

REQUIREMENT TRACKING TABLES

Table 1 Permits and Authorizations Tracking

Permit/Authorization	Purpose and Authority	Requirement Sources	Timing and Submittal Requirements	Review/Coordination ^a		Status
				Submitted	Approved	
Required Prior to All Construction Activities						
CPUC Permit to Construct (PTC)	CPUC authorization to construct the project <i>CPUC General Order (GO) 131-D, Section III.B</i>	MMCRP	PG&E obtained a PTC from CPUC (as issued through the CPUC Proceeding Decision).	CPUC: 12/3/15	CPUC: 12/14/17; 4/26/18	Complete On 1/12/18, PG&E submitted an Application for Rehearing of Decision to address language in the CPUC's original decision regarding GO 95. PG&E's application was denied and the original decision was amended.
			*PG&E shall submit any requests for Minor Project Refinements (MPRs) or Petition for Modifications (PFMs), as needed, prior to deviating from the CPUC-approved project.	*CPUC: Ongoing	*CPUC: Ongoing	Ongoing MPR #1 (Staging Area LZ-5); approved with NTP #1 MPR #2 (access road to LZ-3); denied MPR #3 (TAP Staging Area SA-5); approved with NTP #2 MPR #4 (access route to Poles 27-28); withdrawn MPR #5 (access route to Pole 68); pending review MPR #6 (turnout on access road to LZ-6); approved MPR #7 (access route to PS-10); pending review
State Water Resources Control Board (SWRCB) General Permit	Permit for discharging stormwater associated with construction and land disturbance activities of one acre or more <i>Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ</i> The General NPDES Permit requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) (refer to Table C-2)	MM Hydrology-1: SWPPP Development and Implementation MM Hydrology-2: SWPPP Monitoring Program	PG&E shall submit Permit Registration Documents (PRDs) (e.g., Notice of Intent [NOI], etc.) once obtained from the SWRCB.	SWRCB: 6/25/18 CPUC: 6/27/18	SWRCB: 6/25/18 CPUC: 6/27/18	Complete
			PG&E shall submit all Notice of Termination (NOT) forms to CPUC once SWPPP requirements have been met and permit coverage has ended.	SWRCB: Pending CPUC: Pending	SWRCB: Pending CPUC: Pending	Pending The pending requirements are not applicable to NTP #3.
Required Prior to Specific Construction Activities						
Federal Aviation Administration (FAA) Notice of Proposed Construction or Alteration	Regulations apply to poles and conductor over 200 feet in height above ground level or within certain proximities to local airports <i>Federal Aviation Regulations (FAR) and Code of Federal Regulations (CFR) Part 77</i>	Consistency with impact analysis in IS/MND	An initial Notice (Form 7460) and FAA determination were completed; however, a revised notice must be submitted within 45 days of construction. PG&E shall submit a final Notice to FAA and provide a copy of the Notice and FAA determination to CPUC once obtained.	FAA: 2/6/18 CPUC: 2/8/16	FAA: 2/6/18 CPUC: 2/8/16	Partially Complete FAA determination of no hazard is complete for the poles identified in the Final IS/MND. Filing of FAA Form 7460-2, Part 2 pending (due within 5 days after construction reaches its greatest height). Additional FAA notification would be required if major pole changes occur. The pending requirements are not applicable to NTP #3.
FAA Congested Area Plan for External Helicopter Loads	Regulations for carrying external helicopter loads in congested areas (e.g., residential areas) <i>Title 14 Code of Federal Regulations (CFR) Part 133</i>	MM Traffic-2: Overhead Construction Safety	PG&E shall submit the Plan for FAA approval prior to conducting helicopter activity in congested areas , and submit a copy of the approved plan to CPUC.	FAA: Pending CPUC: Pending	FAA: Pending CPUC: N/A	Pending – Condition of Approval #5

REQUIREMENT TRACKING TABLES

Permit/Authorization	Purpose and Authority	Requirement Sources	Timing and Submittal Requirements	Review/Coordination ^a		Status
				Submitted	Approved	
California Department of Transportation (Caltrans) Standard Encroachment Permit	Use of California state highways for purposes other than normal transportation, including construction activities completed within the Caltrans right-of-way (ROW) <i>Section 660 of the California Streets and Highways Code</i>	MM Traffic-1: Construction Traffic Management MM Traffic-3: Roadway Damage	PG&E shall acquire the permit and provide a copy to CPUC prior to work within the US 101 ROW.	Caltrans: Pending CPUC: Pending	Caltrans: Pending CPUC: N/A Pending	Pending The pending requirements are not applicable to NTP #3.
Caltrans Transportation Permit	Movement of oversized or excessive load vehicles on the state transportation network <i>California Vehicle Code</i>	MM Traffic-1: Construction Traffic Management MM Traffic-3: Roadway Damage	PG&E shall acquire the permit and provide a copy to CPUC prior to transportation of oversized equipment on the state transportation network.	Caltrans: Pending CPUC: 7/20/18	Caltrans: Pending CPUC: N/A	Complete
Sonoma County Building Permit	Constructing structures associated with the Fitch Mountain Substation <i>Sonoma County Code of Ordinances, Chapter 7 Building Regulations, Section 7-5</i>	MMCRP	PG&E shall acquire the permit and provide copy to CPUC prior to constructing the Fitch Mountain Substation.	County: Pending CPUC: Pending	County: Pending CPUC: N/A	Pending The pending requirements are not applicable to NTP #3.
Sonoma County Encroachment Permit	Construction activities within Sonoma County roadways not covered by existing franchise agreements <i>Sonoma County Code of Ordinances, Chapter 7 Building Regulations, Article III</i>	MM Traffic-1: Construction Traffic Management MM Traffic-3: Roadway Damage	PG&E shall acquire the permit and provide a copy to CPUC prior to work within County roadways.	County: 7/20/18 CPUC: 7/20/18	County: 7/20/18 CPUC: N/A	Partially Complete An encroachment permit was provided for the TAP Staging Area entrance off of Bailhache Avenue. Additional encroachment permits are required for any County lane or road closures. PG&E will be required to provide any additional encroachment permits to the CPUC as they become necessary.
Sonoma County Transportation Permit	Movement of oversized or excessive load vehicles on the County transportation network <i>Sonoma County Code of Ordinances, Chapter 15 Highways, Roads and Bridges, Article II</i>	MM Traffic-1: Construction Traffic Management MM Traffic-3: Roadway Damage	PG&E shall acquire the permit and provide a copy to CPUC prior to transportation of oversized equipment on the County transportation network.	County: Pending CPUC: Pending	County: Pending CPUC: N/A	Complete
Required Following Specific Discoveries/Determinations						
*United States (U.S.) Army Corps of Engineers (USACE) Section 404 Nationwide Permit	Work in waters of the U.S., including wetlands <i>Section 404 of the Clean Water Act</i>	MM Biology-11: Wetland Mitigation MM Hydrology-4: Watercourse Avoidance and Crossing Plan	*PG&E shall acquire a permit and provide a copy to CPUC prior to impacting waters of the U.S., including wetlands.	*USACE: TBD *CPUC: TBD	*USACE: TBD *CPUC: N/A	TBD Impacts to jurisdictional water features associated with NTP #3 will be avoided and permitting requirements are not anticipated. PG&E would be required to obtain the necessary permits if any impact to a jurisdictional water feature becomes anticipated.
*U.S. Fish and Wildlife Service (USFWS) Section 10 Incidental Take Permit	Regulates impacts on federally-listed, threatened, or endangered plants and animals, and the habitats upon which they depend. <i>Section 10 of the Endangered Species Act</i>	AMP BIO-7: California Tiger Salamander MM Biology-2: Special-status Plants MM Biology-3: California Red-legged Frog	*PG&E shall acquire permits and provide copies to CPUC prior to any incidental take of federally-listed species or federally-protected habitat.	*USACE: TBD *CPUC: TBD	*USFWS: TBD *CPUC: N/A	TBD No special-status species have been identified in project areas to date. PG&E would be required to obtain the necessary permits if special-status species are discovered during pre-construction surveys or during construction clearances. PG&E's Bay Area Habitat Conservation Plan completed in December 2017 would be applied for select species covered by the plan, including California red-legged frog.

REQUIREMENT TRACKING TABLES

Permit/Authorization	Purpose and Authority	Requirement Sources	Timing and Submittal Requirements	Review/Coordination ^a		Status
				Submitted	Approved	
*RWQCB Section 401 Water Quality Certification	Consistency with state water quality standards, prior to issuance of a USACE Section 404 Permit. <i>Section 401 of the Clean Water Act</i>	MM Biology-11: Wetland Mitigation MM Hydrology-4: Watercourse Avoidance and Crossing Plan	*PG&E shall obtain a 401 Permit prior to obtaining a Section 404 Permit from USACE, and provide a copy of the permits to CPUC prior to impacting waters of the U.S.	*RWQCB: TBD *CPUC: TBD	*RWQCB: TBD *CPUC: N/A	TBD Impacts to jurisdictional water features associated with NTP #3 will be avoided and permitting requirements are not anticipated. PG&E would be required to obtain the necessary permits if any impact to a jurisdictional water feature becomes anticipated.
*California Department of Fish and Wildlife (CDFW) Lake and Streambed Alteration Agreement	Regulates activities that affect waters of the state, including the bed or bank of such features <i>Fish and Game Code Section 1602</i>	MM Hydrology-4: Watercourse Avoidance and Crossing Plan	*PG&E shall acquire any permit and provide a copy to CPUC prior to impacting waters of the state.	*CDFW: TBD *CPUC: TBD	*CDFW: TBD *CPUC: N/A	TBD Impacts to jurisdictional water features associated with NTP #3 will be avoided and permitting requirements are not anticipated. PG&E would be required to obtain the necessary permits if any impact to a jurisdictional water feature would occur.
*CDFW Section 2081(b) Incidental Take Permits or Consistency Determination	Impacts on state-listed, threatened, or endangered species, and the habitats upon which they depend <i>Fish and Game Code Section 2081(b)</i>	AMP BIO-7: California Tiger Salamander APM BIO-8: American Badger APM BIO-9: Western Pond Turtle MM Biology-2: Special-status Plants MM Biology-4: Foothill Yellow-legged Frog	*PG&E shall acquire any permits and provide copies to CPUC prior to any incidental take of state-listed species or state-protected habitat.	*CDFW: TBD *CPUC: TBD	*CDFW: TBD *CPUC: N/A	TBD No special-status species have been identified in project areas to date. PG&E would be required to obtain the necessary permits if special-status species are discovered during pre-construction surveys or during construction clearances.
*Sonoma County culvert design approval	Requirements regarding the design of culverts that could impede flood water <i>Sonoma County Flood Control Design Criteria</i>	MM Hydrology-5: Culvert Design	PG&E shall acquire the permit and provide a copy to CPUC prior to modifying or installing culverts.	*County: Pending *CPUC: Pending	*County: Pending *CPUC: N/A	TBD PG&E no longer anticipates a need for culvert installation or replacement.

Notes:
^a All project permits, and authorizations provided by other agencies, must be submitted to CPUC. CPUC reserves the right to review and comment on the accuracy and adequacy of project permits and authorizations, if necessary.
 * Requirements marked with an asterisk are only applicable under specified conditions.

Table 2 Plans Tracking

Plan	Requirement Sources	Timing and Submittal Requirements	Review/Coordination ^a		Status
			Submitted	Approved	
Required Prior to All Construction Activities					
Worker Environmental Awareness Program (WEAP) Training Materials (also referred to as the Environmental Training Program [ETP])	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	PG&E shall submit all ETP materials to CPUC for review and approval no less than 30 days before construction.	CPUC: 5/30/18	CPUC: 6/8/18	Complete CPUC approved the supervisor level training presentation (Tracking #WT-01.2). Copies of the final training pamphlets for workers were provided on 6/25/18.

REQUIREMENT TRACKING TABLES

Plan	Requirement Sources	Timing and Submittal Requirements	Review/Coordination ^a		Status
			Submitted	Approved	
Revegetation, Restoration, and Monitoring Plan	MM Biology-7: Revegetation, Restoration, and Monitoring Plan	PG&E shall submit the plan to the CPUC for review and approval no less than 60 days before construction.	CPUC: 3/5/18	CPUC: 6/13/18	Complete Tracking #P-01.2
Stormwater Pollution Prevention Plan (SWPPP)	MM Hazards-1: Hazardous Materials Procedures and Worker Training MM Hydrology-1: SWPPP Development and Implementation MM Hydrology-2: SWPPP Monitoring Program	A Qualified SWPPP Developer (QSD) shall prepare a SWPPP for the project in accordance with the SWRCB General Permit (refer to Table C-1). PG&E shall submit the SWPPP to the CPUC for review and comment no less than 30 days prior to construction.	CPUC: 5/8/18	CPUC: 6/11/18	Complete Tracking #P-04.3
Required Prior to Specific Construction Activities					
Construction Fire Prevention Plan	MM Hazards-2: Construction Fire Prevention Plan	PG&E shall submit the plan to CPUC for review and approval at least 30 days prior to construction within the Northern Segment.	CPUC: 4/20/18	CPUC: 6/14/18	Complete Tracking #P-02.3
Watercourse Avoidance and Crossing Plan	MM Biology-11: Wetland Mitigation MM Hydrology-1: SWPPP Development and Implementation MM Hydrology-4: Watercourse Avoidance and Crossing Plan	PG&E shall prepare a Seasonal Watercourse Avoidance and Crossing Plan and submit the plan to the CPUC no less than 60 days prior to use or construction of surface water crossings or work within 50 feet of surface water resources.	CPUC: 4/20/18	CPUC: 7/19/18	Complete Tracking #P-03.2
Required Following Specific Discoveries/Determinations					
*Special-status Plant Salvage and Replanting Plan	MM Biology-2: Special-status Plants	*If impacts on the special-status plant species cannot be avoided and if impacts would be substantial, as determined by the CPUC, PG&E shall prepare and implement a Special-status Plant Salvage and Replanting Plan. PG&E shall submit the plan to the CPUC for review and approval no less than 30 days prior to impacting or collecting special-status plants. If CPUC determines that the Salvage and Replanting Plan is not likely to be, then either (1) impacts on the special-status plants in questions must be avoided, or (2) a financial contribution will be made to an organization that restores/protects special-status plant populations in the project region.	*CPUC: TBD	*CPUC: TBD	TBD Surveys for special-status plants were completed in 2016 and 2017. No special-status plants were identified.
*Wetland Creation/Enhancement Plan	MM Biology-11: Wetland Mitigation	*If wetlands wetland creation/enhancement is necessary, PG&E shall prepare and submit a plan to the CPUC, USACE and RWQCB for review and approval prior to impacting any wetlands.	*USACE: TBD *RWQCB: TBD *CPUC: TBD	*USACE: TBD *RWQCB: TBD *CPUC: TBD	TBD To date, wetlands are not located within project areas and no impacts would occur.
*Research and Data Recovery Plan	MM Cultural-4: Data Recovery	*If CRHR-eligible, unique archaeological, or tribal cultural resource data recovery occurs, PG&E shall prepare a Research and Data Recovery Plan for each individual site where data recovery is necessary. The plans shall be submitted to the CPUC for approval prior to conducting data recovery procedures for each site.	*CPUC: TBD	*CPUC: TBD	TBD To date, data recovery has not been proposed for any cultural site and all potentially eligible sites would be avoided.

Notes:

^a All project Plans required by other agencies must be submitted to CPUC. CPUC reserves the right to review and comment on the accuracy and adequacy of all project Plans, if necessary.

* Requirements marked with an asterisk are only applicable under specified conditions.

REQUIREMENT TRACKING TABLES

Table 3 Notifications Tracking

Notification	Entities to Notify	Requirement Sources	Timing and Submittal Requirements	Review/Coordination ^a		Status
				Submitted	Approved	
Required Prior to All Construction Activities						
Post signs with dust complaint information	Public	APM AIR-1: Fugitive Dust Emissions MM Noise-1: General Construction Noise	PG&E shall install a publicly visible sign at work areas where grading/blading and helicopter activities occur near public and residential areas prior to grading/blading and helicopter activities.	CPUC: 1/24/18	CPUC: 1/24/18	Partially Complete The draft signs were approved by CPUC. Signs must be posted immediately prior to the initiation of work where grading/blading and helicopter activities occur near public and residential areas. The pending requirements are not applicable to NTP #3.
Required Prior to Specific Construction Activities						
General construction noise disturbance	All noise-sensitive receptors within 500 feet of work areas	MM Noise-1: General Construction Noise	Noise-sensitive receptors within 500 feet of work areas shall be provided written notice at least 7 days prior to beginning construction.	CPUC: 5/17/18	CPUC: 5/17/18	Complete Tracking #N-01.1; notification letters sent 5/18/18
Helicopter noise disturbance	School administrators for Mark West Elementary School and San Miguel Elementary School	MM Noise-2: Schools	Prior to helicopter activities within 500 feet of schools , PG&E shall coordinate with school administrators to determine the schedule for noise-sensitive periods that must be avoided during helicopter operation within 500 feet.	CPUC: Pending	CPUC: N/A	Pending The pending requirements are not applicable to NTP #3.
Helicopter noise disturbance	All noise-sensitive receptors within 500 feet of any location where helicopter activity will occur	MM Noise-3: Helicopter Activities	Noise-sensitive receptors within 500 feet from any location where helicopter activities may occur, including flight paths if applicable, shall be provided written notice at least 30 days prior to beginning helicopter activities.	CPUC: 5/17/18	CPUC: 5/17/18	Complete Tracking #N-01.1; notification letters sent 5/18/18
Construction activities within parks	Sonoma County park officials and park users for Maddux Ranch Regional Park, Shiloh Ranch Regional Park, and Foothill Regional Park	APM REC-1: Coordination with Park Management and Signage MM Recreation-2: Trail Detours and Notifications	PG&E shall post signs at park and trail entrances at least 1 week in advance of parks or trail closures. PG&E shall coordinate with county officials regarding park and trail closures and detours at least 90 days prior to such closures.	County: Pending CPUC: Pending	County: Pending CPUC: N/A	Pending - Condition of Approval #6
Emergency access disruption	Local emergency service providers (i.e., local fire districts, law enforcement offices, hospitals, and ambulance and paramedic services)	MM Traffic-4: Emergency Access	PG&E shall notify local emergency service providers no less than 1 week before construction activities	Emergency Services: Pending CPUC: Pending	Emergency Services: N/A CPUC: N/A	Pending The pending requirements are not applicable to NTP #3.
Affected public transit routes and stops	Sonoma County Transit (SCT)	MM Traffic-5: Public Transit	PG&E shall notify SCT no less than 30 days before construction in the Southern Segment and identify roadway segments where bus routes and bus stops are located that may be affected during construction.	SCT: Pending CPUC: Pending	SCT: N/A CPUC: N/A	Pending The pending requirements are not applicable to NTP #3.

REQUIREMENT TRACKING TABLES

Table 4 Pre-construction Survey Tracking

Resource/Topic	Requirement Sources	Status
California tiger salamander	APM BIO-7: California Tiger Salamander Santa Rosa Plain Conservation Strategy (SRPCS)	Pending – Condition of Approval #7a-c Pre-construction wildlife surveys are required immediately prior to work activities in each new area.
American badger	APM BIO-8: American Badger	
Western pond turtle	APM BIO-9: Western Pond Turtle	
Special-status plants	MM Biology-2: Special-status Plants	Complete Surveys for special-status plants were completed in 2016 and 2017. No special-status plants were identified.
California red-legged frog (CRLF)	MM Biology-3: California Red-legged Frog	Partially Complete – Condition of Approval #7d-e Suitable habitat for CRLF and FYLF was mapped within 500 feet of current work areas for the entire project (Tracking #S-03.1). Minor revisions were required to the maps included with the habitat assessment report. Additional habitat assessments would be required for any new work areas that may be proposed. Pre-construction wildlife surveys are required immediately prior to work activities in each new area.
Foothill yellow-legged frog (FYLF)	MM Biology-4: Foothill Yellow-legged Frog	
Nesting birds	MM Biology-5: Special-status and Protected Migratory Birds	Pending – Condition of Approval #7f Pre-construction nesting bird surveys are required immediately prior to work activities in each new area.
Special-status and protected bats	MM Biology-6: Special-status and Protected Bats	Partially Complete – Condition of Approval #7g PG&E completed the required bat habitat assessment for suitable roosts within 50 feet of project areas (Tracking #S-02.2). Additional habitat assessments would be required for any new work areas that may be proposed. An acoustic emergence survey must be completed, and the results reported to CPUC, prior to impacting suitable roosts during the breeding season.
Temporarily disturbed areas	MM Biology-7: Revegetation, Restoration, and Monitoring Plan	Complete Tracking #P-01.2

REQUIREMENT TRACKING TABLES

Resource/Topic	Requirement Sources	Status
Sensitive plant communities	MM Biology-9: Sensitive Natural Plant Communities	<p>Complete</p> <p>A pre-construction vegetation memo was submitted covering all project work areas. Sensitive natural plant communities were identified in the memo, including Oregon oak woodland and riparian woodland. Additional vegetation mapping would be required for any new work areas that may be proposed.</p>
Vegetation infected with Sudden Oak Death	MM Biology-10: Sudden Oak Death Procedures	<p>Pending – Condition of Approval #7h</p> <p>All work areas must be inspected for signs of infected vegetation prior to construction.</p>
Cultural resources ^a	MM Cultural-3: Pre-Construction Cultural and Tribal Cultural Resource Surveys	<p>Complete</p> <p>The work areas identified in NTP #3 are within the cultural survey area shown in the Final IS/MND. No resources were identified in these areas.</p>
Geotechnical investigation	<p>APM GS-3: Site-specific Geotechnical Investigation</p> <p>MM Geology-1: Geotechnical Investigation Report</p>	<p>Complete</p> <p>Tracking #R-02.1</p> <p>Additional geotechnical review is required prior to any grading in landslide prone areas identified in the report.</p>

Notes:

^a Cultural surveys were completed for all preliminary work areas identified in the IS/MND, and for a large portion of the IS/MND study area where work areas could be relocated. Cultural survey areas are shown on Figure E-1 of the Final IS/MND. Additional cultural surveys are only required if work areas or access roads are relocated to areas that were not previously surveyed, including those within the IS/MND study area.

REQUIREMENT TRACKING TABLES

Table 5 Pre-construction Report Tracking

Report	Preparation/Submittal Frequency	Requirement Sources ^a	Contents	Status
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.	Complete Surveys for special-status plants were completed in 2016 and 2017. No special-status plants were identified.
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.	Complete A pre-construction vegetation memo was submitted covering all project work areas. Sensitive natural plant communities were identified in the memo, including Oregon oak woodland and riparian woodland. Additional vegetation mapping would be required for any new work areas that may be proposed.

REQUIREMENT TRACKING TABLES

Report	Preparation/Submittal Frequency	Requirement Sources ^a	Contents	Status
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.	<p>Partially Complete – Condition of Approval #8</p> <p>Tracking #R-03.1</p> <p>Three trails identified in the Pre-Project Trail Conditions Report have not been approved as access routes, including access routes along Big Leaf Trail in Shiloh Ranch Regional Park, and Peeler Post Trail and Three Lakes Trail in Foothill Regional Park. PG&E must obtain approval from CPUC prior to using these trails as access routes through the MPR process.</p> <p>PG&E must also amend the Pre-Project Trail Conditions Report if access routes are proposed on any additional trails in regional parks other than those specifically addressed in the approved report.</p>

REQUIREMENT TRACKING TABLES

Report	Preparation/Submittal Frequency	Requirement Sources ^a	Contents	Status
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.	<p>Partially Complete – Condition of Approval #9</p> <p>Tracking #R-02.1</p> <p>Prior to pole replacement, PG&E shall provide written confirmation that applicable pole recommendations to address geohazards identified in the geotechnical investigation report (Kleinfelder 2017 and 2018) were incorporated into the final project designs.</p> <p>If grading becomes necessary within a documented landslide risk area identified in the report, additional geotechnical review must be conducted prior to grading. In such cases, PG&E must provide a letter from a geotechnical engineer that either (1) states the project would not increase the risk of landslides as a result of grading activities; or (2) recommends site-specific methods to adequately address such risks. Any recommendations must be incorporated into the final grading plans that would be submitted to the County for a grading permit.</p>