



PG&E Shepherd Substation Project

Mitigation Monitoring, Compliance, and Reporting Program

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PANORAMA
ENVIRONMENTAL, INC.

PG&E Shepherd Substation Project

Mitigation Monitoring, Compliance, and Reporting Program

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LIST OF ACRONYMS AND ABBREVIATIONS

APM	applicant proposed measure
AMM	avoidance and minimization measure
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CPUC	California Public Utilities Commission
DL	distribution line
DOC	submit written documentation verifying EPM implementation (memorandum, letter, or email correspondence)
ECMP	Environmental Compliance Management Plan
ESCP	Erosion and Sediment Control Plan
EI	environmental inspector
EM	environmental monitor
EPM	environmental protection measure
ETP	Environmental Training Program
HCP	habitat conservation plan
IS/MND	Initial Study/Mitigated Negative Declaration
kV	kilovolt
MFC	Minor Field Change
MM	mitigation measure
MMCRP	Mitigation Monitoring, Compliance, and Reporting Program
MON	monitor or visually verify on site
MPM	Minor Project Modification
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NTP	Notice to Proceed
O&M	operations & maintenance
PG&E	Pacific Gas & Electric Company
PL	power line

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LIST OF ACRONYMS AND ABBREVIATIONS

PPP	submit a plan, program, or permit
PRMP	Paleontological Resource Management Plan
PTC	Permit to Construct
REP	verify through reporting in the PG&E Compliance Reports and CPUC Monitoring Reports
REV	review and verify submitted plan, program, permit, or other written documentation
RWQCB	Regional Water Quality Control Board
SJKF	San Joaquin kit fox
SUB	substation construction
SURV	submit survey results
SWPPP	Stormwater Pollution Prevention Plan
TEWS	Temporary Extra Work Space
U.S.	United States
USFWS	U.S. Fish and Wildlife Service

1 INTRODUCTION

1.1 PROJECT OVERVIEW

Pacific Gas and Electric Company (PG&E) filed an application with the California Public Utilities Commission (CPUC) on December 8, 2010, for a Permit to Construct (PTC) the Shepherd Substation Project (project). PG&E filed with CPUC an amendment to the application for a PTC on December 2, 2011. CPUC approved PG&E's PTC on May 23, 2013 (Application No. A. 10-12-003). The proposed project includes:

- A 115/21-kilovolt (kV) electrical substation
- Approximately 1.5 miles of 115-kV power line
- Extension of an existing distribution line
- Three new underground distribution lines

The proposed electrical substation, power line, and distribution lines are located in an unincorporated area of Fresno County, California, north of the City of Clovis (Figure A-1 in Appendix A).

1.2 ENVIRONMENTAL ANALYSIS

California Environmental Quality Act Process

A Final Initial Study/Mitigated Negative Declaration (IS/MND) was prepared by CPUC, pursuant to the California Environmental Quality Act (CEQA), the amended State CEQA Guidelines (14 California Resources Code 15000 et seq.), and the CPUC CEQA rules (Rule 2.4), to address the potential impacts of the project on the environment. The CPUC adopted the IS/MND (State Clearinghouse No. 2012051067) on May 23, 2013, in accordance with CEQA Public Resources Code §21080.

The IS/MND includes mitigation measures (MMs) to reduce all of the impacts of the proposed project to less-than-significant levels. PG&E included applicant proposed measures (APMs) in their PEA and applicable avoidance and minimization measures (AMMs), specified in the PG&E San Joaquin Valley Operation & Maintenance Habitat Conservation Plan (HCP), to further reduce potential project impacts. Together these measures comprise the required mitigation for the project and are collectively referred to as the project environmental protection measures (EPMs). The project EPMs are listed in Table B-1 in Appendix B.

CEQA Lead Agency

CPUC is the lead agency for review of the project under CEQA.

1.3 MITIGATION MONITORING, COMPLIANCE, AND REPORTING PROGRAM

Authority of the Program

CPUC must adopt a reporting or monitoring program to ensure compliance with project mitigation measures during project implementation pursuant to Section 21081.6 of the Public Resources Code and Section 15097 of the CEQA Guidelines. Chapter 4 of the IS/MND included a recommended framework for preparing and implementing the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) prior to construction of the project. This MMCRP has been prepared in accordance with these requirements.

Purpose of the Program

The purpose of the MMCRP is to ensure effective implementation of the project EPMs adopted in the IS/MND and to clarify monitoring requirements, reporting protocols, and compliance evaluation methods. The MMCRP shall be implemented during construction of the project when the majority of impacts will take place.

Program Adoption Process

The mitigation proposed in the IS/MND and the framework for this MMCRP were approved by CPUC on May 23, 2013, as described in Chapter 4 of the IS/MND. This MMCRP was prepared with direct participation from PG&E.

1.4 PRECONSTRUCTION REQUIREMENTS

Project Plans and Programs

Several project EPMs require preparation, review, and approval of project plans or programs that describe specific mitigation protocols to be followed throughout the project. PG&E must submit project plans to any identified jurisdictional agencies for review and comment, and/or approval. Final plans, as well as agency comments, must be submitted to CPUC for approval as described in the project EPMs. Construction activities must be conducted in accordance with the requirements stipulated in these plans in addition to all project EPMs. A summary of project plans is included in Table 1.4-1.

Preconstruction Surveys

Several project EPMs require preconstruction (or “pre-activity”) surveys for sensitive environmental resources. Table 1.4-2 summarizes required preconstruction surveys for the project. PG&E is required to submit survey results to the CPUC. PG&E will consult with California Department of Fish and Wildlife (CDFW) (formerly the California Department of Fish and Game) and the U.S. Fish and Wildlife Service (USFWS) if AMMs cannot be implemented and as specified in the mitigation measures. Specific submission requirements and timeframes are described in the full EPM text located in Table B-1 (Appendix B).

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Table 1.4-1: Required Project Plans and Programs

Plan Name	Requirement Source(s)	Agency Submission and/or Approval	Timeframe for Submittal by PG&E
Cultural Resources Awareness Program	MM Cultural-1	CPUC	At least 30 days prior to construction
Environmental Training Program (ETP), and an Environmental Compliance Management Plan (ECMP)	APM Bio-6 AMM 1 MM Hazards-2 ¹	CPUC	At least 30 days prior to construction
Paleontological Resource Management Plan (PRMP)	MM Cultural-2	CPUC	At least 30 days prior to construction
Site Safety Plan	MM Hazards-1	CPUC	At least 30 days prior to construction
Site-specific Burrowing Owl Plan	AMM 18	CPUC	Required only if burrowing owls are present, and an occupied burrow cannot be avoided
Stormwater Pollution Prevention Plan (SWPPP), including an Erosion and Sediment Control Plan (ESCP)	APM Geo-1/WQ-1	Central Valley Regional Water Quality Control Board CPUC	Prior to construction
Traffic Management Plan	APM Tran-2	Fresno County CPUC	At least 7 days prior to lane closures
<p>NOTE:</p> <p>¹ MM Hazards-2 specifies implementation of an Environmental Training and Monitoring Program. PG&E has clarified that an Environmental Training Program will be developed to address worker training, and a separate Environmental Compliance Management Plan will be developed to address monitoring requirements.</p>			

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Table 1.4-2: Required Preconstruction Surveys			
Resource Survey	Requirement Source(s)	Timeframe*	Survey Area*
Aquatic Habitat			
Seasonal wetlands and aquatic habitat	APM Bio-20	Flag prior to construction and avoid during construction	Power line
Vernal pools	AMM 15	Flag prior to construction and avoid during construction	Power line
Wildlife			
Special status amphibians and reptiles	AMM 17	Prior to construction (only required if suitable amphibian or reptile habitat is present for listed species, and if protocol-level surveys are not conducted)	Suitable habitat for special status reptiles and amphibians
Nesting birds (unlisted raptors and passerines, as well as special status species)	MM Biology-4	No more than 30 days prior to construction, when construction start is during the nesting season, and prior to the start of construction in any new work area	Within 500 feet from all work areas for raptors and within 250 feet for all passerines, to the extent of PG&E right-of-way and where access is permitted.
Special-status raptor nests	AMM 22 AMM 19	Prior to construction	Within 500 feet from all work areas, to the extent of PG&E right-of-way and where access is permitted.
Burrowing owl	AMM 18 MM Biology-3	No more than 30 days prior to construction	Within 500 feet on the westerly side of the new power line and to the extent of PG&E's right-of-way on the easterly side
San Joaquin kit fox (SJKF)	AMM 21 MM Biology-5	No more than 30 days prior to construction	Within 250 feet on either side of work areas or to the extent of PG&E's right-of-way
Molestan blister beetle	MM Biology-2	No more than 30 days prior to construction	Extent of the power line easement and predetermined access routes within suitable habitat
American badger	MM Biology-6	No more than 30 days prior to construction	Within 250 feet on either side of work areas or to the extent of PG&E's right-of-way

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Table 1.4-2: Required Preconstruction Surveys			
Resource Survey	Requirement Source(s)	Timeframe*	Survey Area*
Plants			
Special status plants (described in the IS/MND)	MM Biology-1	Prior to construction during the appropriate season	Within 200 feet on the westerly side of the new power line and to the extent of PG&E's right-of-way on the easterly side
Any Additional Work Areas			
Cultural resources	APM Cult-2	As needed, if work areas that were not included in the PEA are proposed	In any new proposed work areas that have not been previously disturbed
Biological resources	APM Bio-12	As needed, if work areas that were not included in the PEA are proposed	In any new proposed work areas that have not been previously disturbed
*Refer to Mitigation Measure language for details on the survey area and timeframe.			

Permits

Local, state, and federal agencies have jurisdiction over lands and/or resources in the project area. PG&E may be required to obtain various permits to complete aspects of construction, and project EPMs may require specific agency consultation and authorization to address environmental laws and regulations. As the lead agency, CPUC is responsible for ensuring EPMs reviewed and approved by jurisdictional agencies during the IS/MND process are implemented throughout construction. In addition to designated CPUC representatives, staff from other jurisdictional agencies may periodically visit the project site and request information regarding the status of mitigation implementation.

PG&E is responsible for satisfying requests from jurisdictional agencies, and shall notify CPUC of jurisdictional agencies requirements, as well as provide correspondence related to final approvals and permits for the project if CPUC is not otherwise copied on the correspondence. Additional information on agency communication protocol is presented in Section 3.6. Table 1.4-3 lists jurisdictional agencies and permits required for the project.

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Table 1.4-3: Required Permits and Approvals		
Agency	Permit or Approval	Purpose
California Department of Transportation	Transportation Permit	Use of oversized vehicles
San Joaquin Valley Air Pollution Control District	Dust Control Plan	Dust management for non-residential developments of 5 or more acres of disturbed surface area
State Water Resources Control Board	Notice of Intent (NOI) with National Pollutant Discharge Elimination System (NPDES), Construction General Permit, Order 2009-0009-DWQ	Clean Water Act, Section 402; stormwater permit for projects with more than 1 acre of land disturbance
USFWS and CDFW	Incidental Take Permits The PG&E San Joaquin Valley O&M HCP (prepared December 2006 and revised in 2007, and 2013) addresses incidental impacts to special status species for construction of the project power line. PG&E shall consult with USFWS and CDFW regarding implementation of the HCP, as necessary or as required by AMMs.	Endangered Species Act, Section 10 CDFW Code, Section 2081

1.5 PROPOSED PROJECT SCHEDULE

Construction is scheduled to start in January 2014, with an estimated completion date of March 2016. The proposed PG&E construction schedule is presented in Table 1.5-1.

Table 1.5-1: Proposed Construction Schedule	
Project Activity	Proposed Timeframe
Tree removal and substation construction site work begins	January 2014
Power and distribution line construction	July 2014 – June 2015*
Substation construction	July 2014 – June 2015
Project operational	June 2015
Cleanup	June 2015 – March 2016
Total Duration	January 2014 – March 2016
*Seasonal restrictions may affect the construction timing for the power line.	

Daily Work Periods

Construction crews would work between 6:00 a.m. and 9:00 p.m. on weekdays, and may also work Saturdays or Sundays between the hours of 7:00 a.m. and 5:00 p.m. Construction would

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only be conducted outside of these hours if it is required for project safety, or to take advantage of the limited times when connecting power lines can be taken out of service.

Seasonal Work Exclusion Zones

Project EPMs require specific work restrictions to reduce impacts to environmental resources during sensitive periods. These requirements and restriction periods are summarized in Table 1.5-2. Additional work restrictions may be included in jurisdictional agency permits or conditions of approvals described in Table 1.4-3.

Table 1.5-2: Seasonal Work Restrictions and Exclusion Zones			
Resource	Requirement Source(s)	Exclusion Area Summary Description¹	Timeframe
Aquatic Habitat			
Seasonal wetlands and aquatic habitat	APM Bio-20 APM WQ-2	Seasonal wetlands, ponds, canals, and other water bodies	During construction
Vernal pools	AMM 15	250 feet from vernal pools	Between the first significant rain (approximately October 15) until June 1, or until pools remain dry for 72 hours
Wildlife			
Listed amphibians and reptiles	AMM 17	50 feet from potentially occupied habitat (as determined through preconstruction surveys)	During construction
Non-listed nesting birds	MM Biology-4	250 feet from active passerine nest; 500 feet from active raptor nest	During nesting season (February 1-August 31)
Listed raptors	AMM 19 AMM 22	500 feet from active nest	During nesting season (February 1-August 31)
Listed or fully protected nesting birds	MM Biology-4	0.5 mile from active nest, or as determined through consultation with CDFW and USFWS ²	During nesting season (February 1-August 31)
Burrowing owl	AMM 18 MM Biology-3	160 feet from active dens during non-nesting season (September 1-January 31); 250 feet during nesting season (February 1-August 31); or as determined by a qualified biologist	During construction
Kit fox	AMM 21	50 feet from a potentially occupied den; 100 feet from a known den; natal or pupping den exclusion areas shall be determined on a case-by-case basis in coordination with USFWS	During construction

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Table 1.5-2: Seasonal Work Restrictions and Exclusion Zones

Resource	Requirement Source(s)	Exclusion Area Summary Description ¹	Timeframe
		and CDFW	
American badger	MM Biology-6	50 feet from active den, or as determined through consultation with CDFW	During breeding season (January to June)
Molestan blister beetle	MM Biology-2	25 feet from potentially occupied habitat, or as determined by a qualified biologist and CPUC	During construction
Plants			
Sensitive plants, as determined during surveys	AMM 12	100 feet around special status plant occupied habitat (both standing individuals and the seed bank individuals)	During construction
<p>NOTE:</p> <p>¹ Refer to the applicable measure in Appendix B for details on the exclusion areas and potential modifications to the exclusion areas.</p> <p>² MM Biology-4 states: "...If the qualified wildlife biologist determines that there are listed or fully protected species nests within a 0.5-mile radius of project activities, PG&E will consult with the resource agencies to discuss how to implement the project and avoid "take," or if avoidance is not feasible, in the case of state-listed species, to acquire a state ITP prior to initiation or resumption (whichever applies) of any ground-disturbing activities."</p>			

2 ROLES AND RESPONSIBILITIES

This section describes the roles and responsibilities of the environmental compliance teams for the project, which consists of the PG&E Compliance Team and the CPUC Monitoring Team. Compliance and monitoring-related roles and responsibilities are described below. A list of project personnel performing these roles is located in Appendix C.

2.1 PG&E ROLES AND RESPONSIBILITIES

PG&E project personnel and PG&E's contractors are responsible for implementing all project EPMs, permit conditions, and the MMCRP. Table B-1 (described in Section 5) include criteria that describe EPM implementation and effectiveness criteria. It is PG&E's responsibility to comply with project EPM requirements, plan construction activities in a manner that meets these requirements, document compliance activities and the results of mitigation, and implement the MMCRP.

PG&E Compliance Team

PG&E Legal Counsel

PG&E legal counsel may participate in the compliance effort as determined by PG&E. PG&E legal counsel may review project compliance documents, notifications, or participate in dispute resolution should the need arise.

PG&E Project Manager

The PG&E Project Manager provides overall direction, management, leadership, and corporate coordination for the project. The PG&E Project Manager's responsibilities include:

- Coordinating construction, engineering, and PG&E environmental personnel
- Integrating environmental responsibilities into all levels of the project organization
- Ensuring compliance with project EPMs, permit conditions, and the MMCRP
- Communicating project activities, schedules, and public relation issues to the project team

PG&E Environmental Compliance Lead

The PG&E Environmental Compliance Lead shall be the lead PG&E representative responsible for implementing environmental requirements and the MMCRP. The PG&E Environmental Compliance Lead's responsibilities include:

- Understanding and planning for project requirements and construction needs
- Coordinating and completing preconstruction requirements included in project EPMs, permit conditions, and the MMCRP

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

PG&E Environmental Compliance Supervisor

The PG&E Environmental Compliance Supervisor shall coordinate the activities of the PG&E Environmental Inspector and specialty monitors, and communicate with project management and construction personnel to ensure environmental compliance. The PG&E Environmental Compliance Supervisor's responsibilities consist of those that are delegated by the PG&E Project Manager and the PG&E Environmental Compliance Lead.

PG&E Environmental Inspector

The PG&E Environmental Inspector (EI) shall work closely with construction personnel in the field to implement mitigation and perform, or oversee, required monitoring tasks. The EI shall be the primary field employee responsible for verifying and communicating day-to-day environmental compliance. Multiple EIs may be used by PG&E as needed to effectively monitor compliance during periods of high construction activity or high monitoring demand. The EI's responsibilities include:

- Understanding environmental project requirements and construction needs
- Taking direction from the PG&E Environmental Compliance Lead and PG&E Environmental Compliance Supervisor
- Supporting construction staff to ensure work is conducted in compliance with environmental requirements
- Conducting, or overseeing, monitoring activities specified in project EPMs and permit conditions
- Implementing the MMCRP
- Determining the effectiveness of mitigation and reporting whether adjustments need to be made to the PG&E Compliance Team

PG&E Specialty Monitors

PG&E Specialty Monitors shall be assigned as needed to perform monitoring tasks when project EPMs and permit conditions require a specifically qualified monitor to protect designated resources. An EI may perform specialty monitoring if he or she has the appropriate qualifications and experience.

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Authority to Redirect Work

The EI or PG&E Specialty Monitors have the authority to redirect any construction activities associated with the project, when it is safe to do so, if the activity poses an imminent threat or puts a sensitive resource at undue risk beyond that already permitted. Specific EMP monitoring requirements are located in Table B-1. Communication protocols are defined in Section 3.

Required Monitoring

A summary of required on-site monitoring by both PG&E and CPUC is included in Table 2.1-1.

Table 2.1-1: Required On-site Monitoring				
Requirement Source	Environmental Resource	Monitor Type	Frequency Description	Location(s)
PG&E EI or PG&E Specialty Monitor				
APM Bio-7 (Also see AMMs 15 and 17)	Salamanders and other listed species described in the IS/MND	Biologist	During work near occupied habitat Daily inspection each morning and during ground disturbance within suitable habitat (upland and aquatic)	Within 50 feet of occupied habitat. Within 600 feet of suitable habitat for listed species described in the IS/MND
MM Biology-4	Nesting birds (passerines, raptors, and listed species)	Biologist	During survey periods and during work within established monitoring buffers	Active nest locations within 250 feet (passerines) or 500 feet (raptors) from project activities
MM Cultural-2	Paleontological	Paleontologist	During excavation or augering of 5 feet or greater in diameter, or greater than 5 feet in depth (part-time or full-time, as needed)	Project areas where previously undisturbed strata in the Riverbank Formation rock unit are located (to be determined prior to construction in the Paleontological Resource Management Plan)
SWPPP ¹	Water quality	Qualified SWPPP Practitioner	As required by the SWPPP	All project areas
CPUC Environmental Monitor				
Public Resources Code, Section 21081.6, and Section 15097 of the CEQA	General EPM compliance verification	Unspecified	As determined by CPUC	All project areas

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Table 2.1-1: Required On-site Monitoring				
Requirement Source	Environmental Resource	Monitor Type	Frequency Description	Location(s)
Guidelines				
NOTE:				
¹ The SWPPP shall be developed prior to construction. Site inspections are a standard element of a SWPPP.				

Construction Personnel

Construction Managers

PG&E Construction Managers provide support to the PG&E Project Manager and oversee the activities of construction personnel. The PG&E Construction Managers shall be based out of PG&E’s offices, but may also be available in the field on an occasional basis. PG&E Construction Manager responsibilities include:

- Ensuring compliance with PG&E specifications, project EPMs, permit conditions, MMCRP policies, construction contracts, and applicable codes
- Communicating construction needs and schedule changes to the PG&E Compliance Team
- Regularly facilitating field meetings with construction and environmental staff

Construction Leads

At PG&E’s discretion, on-site construction leadership may be delegated to Construction Leads, such as a crew foreman. PG&E Construction Leads provide support to the PG&E Construction Managers, and shall be responsible for communicating with PG&E Construction Managers and EIs to conduct day-to-day project activities in compliance with EPM requirements, permit conditions, and the MMCRP, as directed by the PG&E Compliance Team. Key roles of PG&E Construction Leads are to plan construction activities around environmental requirements, as well as to identify and report potentially infeasible challenges to construction to the PG&E Compliance Team.

Construction Workers

Construction workers who enter the project site are responsible for following all EPM requirements, permit conditions, and the MMCRP. Construction workers are responsible for attending required environmental training(s) applicable to their position, and directing any questions to the PG&E Construction Managers, PG&E Construction Leads, and/or EIs.

Subcontractors

PG&E may elect to use subcontracted construction crews on the project. Under the direction of PG&E, subcontracted construction crews are responsible for complying with EPM requirements, permit conditions, and the MMCRP.

2.2 CPUC ROLES AND RESPONSIBILITIES

CPUC is required to perform mitigation monitoring and reporting for the project as the lead agency under CEQA to ensure that all project EPMs and permit conditions are implemented. CPUC is responsible for verifying project compliance with the IS/MND and shall implement enforcement procedures should project activities deviate from EPMs or permit conditions. Both the CPUC Monitoring Team and the PG&E Compliance Team shall be notified of observed concerns or issues related to compliance and, if necessary, an approach shall be developed to bring the project into compliance. The CPUC mitigation monitoring responsibilities will be conducted by the CPUC contractor who prepared the CEQA document, Panorama Environmental, Inc. (Panorama). Mitigation monitoring responsibilities include:

- Verifying and documenting compliance with EPMs and permit conditions
- Verifying the effectiveness of mitigation
- Performing on-site compliance verification (i.e., site inspections)
- Reporting construction, compliance, and monitoring activities in reports for the CPUC
- Working with the CPUC and PG&E to address any compliance issues
- Managing project compliance and monitoring documents for the CPUC

Responsible agencies such as USFWS, CDFW, and RWQCB may also elect to monitor construction or conduct site inspections. Mitigation monitoring roles and responsibilities of the CPUC Monitoring Team are described in the sections below.

Authority to Stop Work

CPUC has the authority to stop or redirect any construction activity associated with the project, when it is safe to do so, if the activity poses an imminent threat or puts a sensitive resource at undue risk beyond that already permitted. CPUC may also stop or redirect work if EPM requirements or the MMCRP have been violated or remain unresolved. The CPUC has assigned this authority to the CPUC Monitoring Team. The CPUC Monitoring Team shall follow communication protocols that are defined in Section 3.

CPUC Monitoring Team

CPUC Project Manager

The CPUC Project Manager will oversee compliance monitoring to verify compliance of the project with state laws and regulations, project EPMs, and permit conditions. The CPUC Project Manager will provide agency determinations and guidance for the project. The CPUC Project Manager will direct mitigation monitoring and compliance verification activities, and shall be responsible for issuing approval documents described in the MMCRP.

The CPUC Project Manager will be supported by CPUC Legal Counsel as needed.

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Panorama Monitoring Team

Panorama will perform monitoring activities on behalf of CPUC and report directly to the CPUC Project Manager. Panorama will perform compliance verification and documentation of mitigation measure implementation project prior to and during construction. The responsibilities of the CPUC Monitoring Team include:

- Verifying the MMCRP implementation
- Verifying preconstruction requirements are met and documented
- Verifying compliance during construction through review of documentation from PG&E including, but not limited to, surveys, reports, and memoranda
- Verifying compliance during construction through site inspections
- Notifying the CPUC Project Manager of any compliance issues
- Providing the CPUC Project Manager with regular mitigation monitoring reports
- Monitoring construction progress and schedule changes
- Supporting the CPUC Project Manager to review and prepare documents described in the MMCRP
- Manage MMCRP documents and keep a record of compliance documentation for the project

CPUC Monitoring Director

The CPUC Monitoring Director will oversee mitigation monitoring for the project. The roles of the CPUC Monitoring Director include:

- Supporting the CPUC Project Manager to verify implementation of project EPMs and the MMCRP
- Determining the appropriate level and frequency of reporting and site inspection
- Reviewing site inspection and mitigation monitoring reports prepared for CPUC
- Overseeing MMCRP document review and preparation for CPUC
- Coordinating with other jurisdictional agencies to verify compliance with EPMs and permit conditions, as needed

CPUC Monitoring Manager

The CPUC Monitoring Manager shall manage mitigation monitoring for the project and support the CPUC Project Manager and CPUC Monitoring Director to make decisions regarding the project. The CPUC Monitoring Manager will coordinate regularly with designated members of PG&E's Compliance Team regarding compliance of the project and the construction schedule. The CPUC Monitoring Manager will prepare and review mitigation reports for the CPUC, and perform the duties of the CPUC Monitoring Director and the CPUC Environmental Monitor (described below), as needed.

CPUC Environmental Monitor

The CPUC Environmental Monitor (EM) shall be the primary CPUC field inspector for CPUC and shall be responsible for verifying environmental compliance during construction.

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Additional monitors may be used as needed depending on concurrent construction activities and specific monitoring needs. The responsibilities of the CPUC EM are:

- Verifying compliance with EPMs through review of PG&E's compliance reports and other documentation
- Verifying compliance through on-site inspection
- Identifying potential issues with compliance
- Reporting and documenting any concerns or problems with compliance
- Communicating with designated personnel from PG&E's Compliance Team to verify compliance, obtain construction schedule updates, and to coordinate site inspections
- Working with the rest of the CPUC Monitoring Team and PG&E's Compliance Team to resolve any noncompliance or potential noncompliance issues
- Preparing site inspection and mitigation monitoring reports for CPUC

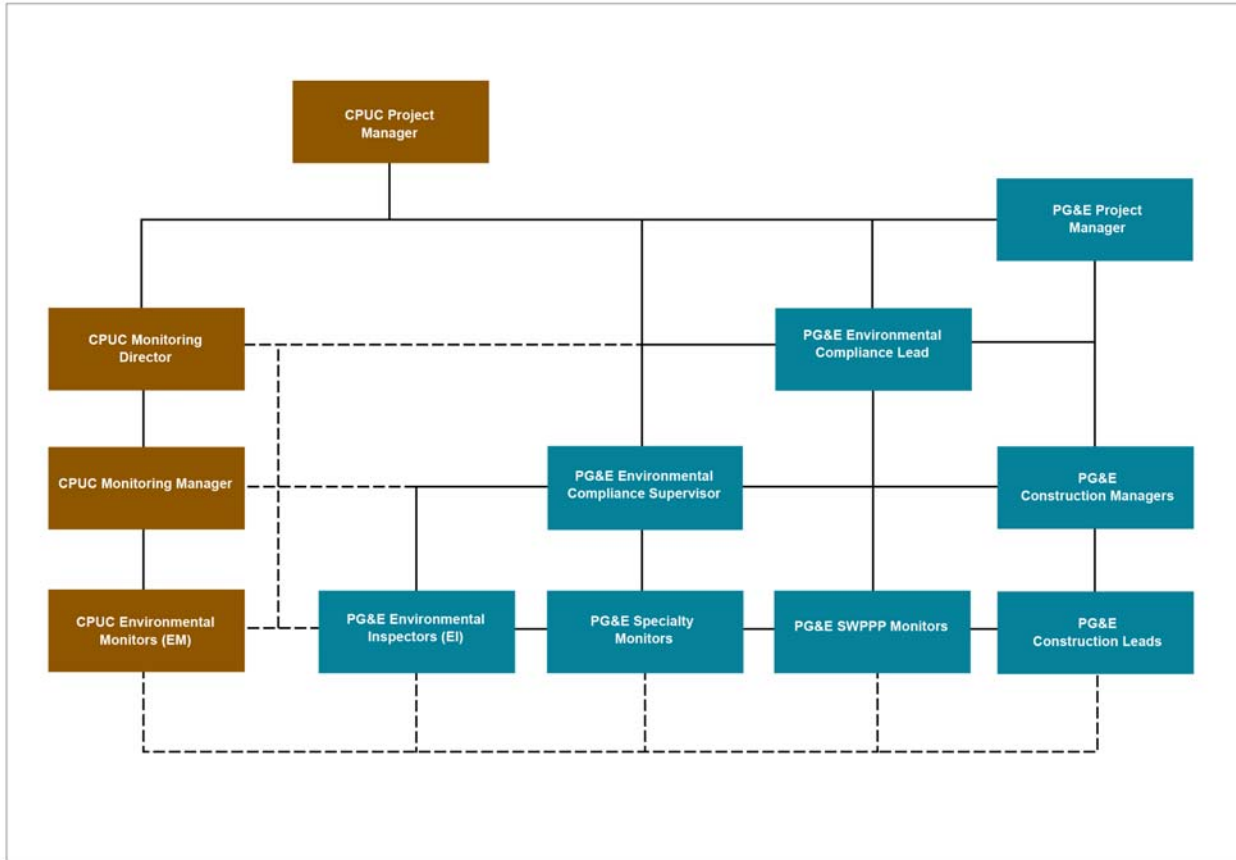
2.3 MMCRP PERSONNEL ORGANIZATION CHART

An organizational chart of the project compliance team is illustrated on Figure 2.3-1. The organization chart illustrates preliminary lines of communication between the project team members.

A project contact list is included in Appendix C. The contact list includes key compliance personnel shown on Figure 2.3-1 and their contact information. The contact list shall be updated periodically and redistributed to the project team, as needed.

Mitigation Monitoring, Compliance, and Reporting Program
ROLES AND RESPONSIBILITIES

Figure 2.3-1: MMRCP Personnel Organization Chart



SOURCE: Panorama 2013

3 COMMUNICATION PROTOCOLS

Communication is a critical component of a successful environmental compliance program. To avoid project delays and possible shut-downs, environmental and construction representatives must interact regularly and maintain professional and responsive communications at all times. Similarly, PG&E representatives must coordinate closely with the CPUC EM to address and resolve issues in a timely manner. A detailed description of typical communication is included in Appendix D.

Mitigation Effectiveness and Feasibility

PG&E shall inform the CPUC Monitoring Team, in writing, of any mitigation measures that are not or cannot be successfully implemented. CPUC shall assess whether alternative mitigation is appropriate and determine with PG&E the subsequent actions required. If the measures are agency permit conditions or involve regulated resources, then PG&E shall consult with the applicable agency to determine the appropriate action and report the agency determination to CPUC.

3.1 COMMUNICATION PRIOR TO CONSTRUCTION

Preconstruction Kickoff Meeting

A preconstruction meeting was held with the CPUC Monitoring Team and the PG&E Compliance Team on September 9, 2013, to review the MMCRP and to mutually agree upon the project's communication protocol. Based on discussions at the meeting and input from each party, Section 3 of this document has been finalized.

It is important that PG&E plan ahead to meet all preconstruction requirements described in Section 1.4 and Section 4. Additional preconstruction requirements may be required by permits identified in Table 1.4-3. PG&E is responsible for completing all preconstruction requirements and providing the CPUC Monitoring Team with adequate documentation that they have been met.

Environmental Compliance Management Plan

PG&E will prepare an Environmental Compliance Management Plan (ECMP) as a guide for key compliance personnel to implement and verify compliance with project EPMs, plans, and permit conditions.

Environmental Training Program

PG&E is required to develop and implement an Environmental Training Program (ETP) prior to construction that shall be provided to all workers before working on the project. This program

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shall target all field personnel including construction personnel, construction management, inspectors, and supervisors. The program shall address specific resource issues, as well as EPM requirements and permit conditions for the project. All field personnel shall be required to participate in the ETP prior to starting work on the project. Project personnel that cannot attend the initial training session may receive an alternate training from a designated PG&E environmental staff member, typically the EI with qualified biological training, or by watching a recording of the initial 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 are acceptable for delivery drivers and site visitors. 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 remain in the presence of a PG&E EI or CPUC EM during their site visit. Personnel that received a limited training would need to complete the full training before receiving higher level access to the site.

The PG&E Compliance Team shall maintain training logs that list all personnel who have participated in the ETP, dates of training, and training level. The training logs shall be submitted to the CPUC Monitoring Team on a regular basis.

3.2 COMMUNICATION DURING CONSTRUCTION

Progress Meetings

The CPUC Monitoring Team or the PG&E Compliance Team may request progress meetings, either in the field or by conference call, to discuss the project schedule or resolve any issues that may have arisen.

Field-level Communication

Many of the issues that come up during construction can be resolved in the field through regular communication between the CPUC EM and the PG&E EI. Questions may be directed to other members of the PG&E Compliance Team and CPUC Monitoring Team, as needed.

PG&E Field Personnel

The PG&E EI or other designated members of the PG&E Compliance Team shall submit questions, notifications, and compliance documentation to the CPUC Monitoring Team. PG&E may first contact the CPUC Monitoring Manager or EM, who shall direct questions to the CPUC Project Manager and CPUC Monitoring Director, as needed. The CPUC Project Manager and CPUC Monitoring Director may also be contacted directly, if necessary.

CPUC Environmental Monitor

The CPUC EM's primary point of contact in the field shall be the lead or on-site PG&E EI. The EM shall contact the EI if an activity is observed that conflicts with one or more of the EPMs in order to make any necessary corrections. If the EM cannot immediately reach a EI, then other members of the PG&E Compliance Team may be contacted to address the problem. The CPUC EM may also request information from other members of PG&E's Compliance Team regarding project compliance, if necessary.

The CPUC EM shall contact the PG&E EI for construction locations, the status of mitigation implementation, and schedule forecasts. The EM may discuss construction procedures directly with the construction contractors; however, PG&E may require that its contractors defer questions to an on-site PG&E representative. In all cases, the EM shall contact PG&E's designated representative if a problem is noted that requires action from the contractor.

Authority to Stop Work

The CPUC EM shall have the authority to temporarily stop or redirect construction activities if a sensitive resource is put at unpermitted risk. The CPUC EM shall first attempt to inform the highest level of PG&E construction management (PG&E Construction Managers or PG&E Construction Leads) if they are immediately available. If they are not available the CPUC EM will inform the PG&E EI and then the workers performing the activity to temporarily halt or redirect work, once it is safe to do so. The authority to stop or redirect work only applies to the direct activity that would cause the potential threat or to avoid a threatened resource, and only for a period of time long enough to contact the PG&E Construction Manager or Construction Leads for further direction. A work activity may only resume once the activity no longer poses a risk to a sensitive resource, or the risk has been permitted through the appropriate methods.

3.3 REPORTING

Regular reporting from both the PG&E Compliance Team and CPUC Monitoring Team will serve as an important tool communicating construction and compliance activities. Project reporting procedures are described in Section 4.3 and a description of reporting communication protocols is located in Appendix D.

Compliance Reporting

The PG&E Compliance Team and the CPUC Monitoring Team shall communicate any concerns or issues concerning compliance with EPMs and permit conditions. Both parties shall follow up with any issues until they have been resolved. Descriptions of compliance documentation and notification procedures are included in Section 4.5 and additional communication protocols are included in Appendix D.

Questions or Observations Requiring Follow-up

Questions or observations may arise that relate to compliance, but do not conflict with compliance requirements. For example, question regarding implementation of an EPM may

require discussion over the intent or feasibility of the measure. These questions may require follow-up discussion, research, or agency consultation. The CPUC Monitoring Team shall document and track such follow-up items until they have been resolved.

Project Changes

The need to modify or change minor aspects of the project may arise. A description of project change procedures is included in Section 4.6 and additional communication protocols are included in Appendix D.

Coordination with Other Agencies

Local, state, and federal agencies have jurisdiction over portions of the project. In addition, many of the mitigation measures were derived from specific permit conditions or agency input. PG&E is responsible for contacting jurisdictional agencies and notifying them of issues within their jurisdiction, as well as providing the CPUC Monitoring Team with any necessary documentation. PG&E's correspondence with jurisdictional agencies regarding project EPMs or permit conditions for the project shall be provided to the CPUC Monitoring Team in order to verify compliance and/or agency approvals.

The CPUC Monitoring Team may elect to contact jurisdictional agencies regarding the project to discuss or clarify EPM requirements, permit conditions, or approvals relating to their jurisdiction.

3.4 DISPUTE RESOLUTION

Disputes or complaints may develop between PG&E and CPUC when conflicting opinions of project processes and procedures are made. It is expected that the MMCRP will reduce or eliminate many potential disputes; however, even with the best preparation, disputes may occur.

Any issues should first be addressed informally at the field level between the CPUC EM and PG&E EI, or at regular progress meetings. Questions may be directed to other members of the PG&E Compliance Team and the CPUC Monitoring Team as needed. Should the issue persist or not be resolved at these levels, the following procedures shall be used:

- Step 1** An unresolved dispute (including those from the public) shall be directed to the CPUC Project Manager for resolution. The CPUC Project Manager shall attempt to resolve the dispute informally. Should an informal process fail, the CPUC Project Manager shall inform PG&E prior to initiating Step 2.
- Step 2** Should the informal resolution process fail (Step 1), the CPUC Project Manager may issue a formal letter requiring corrective actions to address any unresolved deviation from the approved project or adopted MMCRP.

Mitigation Monitoring, Compliance, and Reporting Program
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- Step 3** If a dispute cannot be resolved through Steps 1 and 2, any affected participant may file a written “Notice of Dispute” with the CPUC’s Executive Director. This notice shall be filed in order to resolve the dispute in a timely manner, with copies concurrently served on other affected participants. The Executive Director or designee(s) shall meet or confer within 10 days of receiving the letter with the filer and other affected participants to resolve the dispute. The Executive Director shall issue an “Executive Resolution” describing his or her decision, and serve it to 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,” the affected parties may appeal to CPUC through a procedure to be specified by CPUC.

Parties may also seek review by CPUC through existing procedures specified in the CPUC 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 PROJECT PROCEDURES

4.1 PRECONSTRUCTION COMPLIANCE VERIFICATION

PG&E is required to meet all preconstruction requirements identified in Section 1.4 and EPMs located in Table B-1. Preconstruction requirements include, but are not limited to, preparation or completion of project plans, permits, surveys, studies, and other documentation.

The CPUC Monitoring Team, as well as any specified or applicable agency, must review, comment, and/or approve that each preconstruction requirement has been met prior to authorizing the commencement of construction activities. Authorization to begin construction may only be provided by the CPUC Project Manager. **For purposes of the MMCRP, commencement of construction is defined as any mobilization activity that would move construction-related equipment and/or materials onto a project site.**

Preparation of project plans or acquisition of permits may require long lead times to allow for agencies to review, comment, and issue authorizations, with enough time to meet CPUC submission due dates described in Section 1.4 and Table B-1. The CPUC Monitoring Team shall review project plans and permits once they have been submitted and provide requests for necessary revisions or a notice of approval for each plan, until they are deemed complete.

CPUC may authorize construction to begin on a phased basis should PG&E make such a request. All preconstruction requirements for each separate project phase must be met and approved by CPUC. **CPUC will not authorize construction to begin until all relevant preconstruction requirements are fulfilled as appropriate for a given phase.**

Notice to Proceed

CPUC shall authorize the commencement of construction activities through a Notice to Proceed (NTP) procedure. The NTP procedure involves the PG&E Compliance Team submitting an NTP request package to the CPUC Monitoring Team, which includes a completed NTP Request Form (located in Appendix E) with an updated version of the MMCRP Program Table (described in Section 5 and located in Appendix B) addressing the status of applicable EPMs for the requested action(s), as well as any required documentation specified in the MMCRP Program Table. PG&E shall identify and include any Minor Project Changes related to the requested action with NTP requests, as described in Section 4.6.

The CPUC Monitoring Team shall review the NTP request package to ensure approvals are consistent with the adopted IS/MND and verify that preconstruction requirements for the proposed action(s) have been met. The CPUC Monitoring Team will request additional information from the PG&E Compliance Team until compliance with all preconstruction requirements have been verified. The CPUC Monitoring Director and CPUC Monitoring

Manager shall review PG&E's request package and prepare a draft NTP approval letter for the CPUC Project Manager. An NTP approval letter shall document that relevant preconstruction requirements have been met, as well as provide an analysis of the effects of any minor project changes included in the request.

More than one NTP may be requested if there are separate phases of the project. Additional NTP procedure details are included in Table D-1 located in Appendix D.

4.2 ON-SITE COMPLIANCE VERIFICATION

The PG&E EI and CPUC EM shall conduct routine site visits to inspect the project for environmental compliance. On-site compliance shall be documented through field inspection reports and digital photographs. Site inspections shall be coordinated with PG&E, and at a minimum the CPUC EM shall contact a member of the PG&E Compliance Team to verify that safe access can be granted.

4.3 PROJECT REPORTING

Project reporting procedures for PG&E and CPUC are described below.

Public Access to Records

The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports shall be made available by CPUC for public review upon request.

PG&E Reporting

Daily Inspection Reports

PG&E shall prepare Daily Inspection Reports for each day of construction that summarizes all compliance activities, key observations of any issues or concerns, and the general construction activities for the day. These reports shall be made available to CPUC, as needed.

Compliance Summary Reports

PG&E is responsible for submitting regular (typically weekly) Compliance Summary Reports to CPUC. PG&E's Compliance Summary Reports shall summarize all compliance activities and any issues that occurred during the reporting period, key personnel who conducted work on site, and general construction activities that took place. Any noncompliance incidents (described in Section 4.5) and any complaints from the public shall be documented in the Compliance Summary Reports. During periods of construction inactivity the reporting frequency may be reduced as determined through consultation with CPUC.

Final Compliance Report

PG&E shall prepare a final compliance report that verifies the completed status of project EPMs and permit conditions, and documents the status of any long term restoration activities. A final

**Mitigation Monitoring, Compliance, and Reporting Program
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version of Table B-1 shall be updated as described in Section 5. PG&E shall prepare a record of compliance events that occurred over the duration of the project (described further in Section 4.5). A brief description of each event recorded for the project shall be listed, including at a minimum the date(s) of event and resolution, compliance level designated (shown in Table 4.5-1), EPM(s) or permit condition(s) violated, and a simple description of the event. The Final Compliance Report shall be submitted to the CPUC Monitoring Team within 30 days after construction is completed and only long-term EPM restoration or monitoring requirements remain.

CPUC Reporting

Site Inspection Reports

The CPUC EM shall prepare Site Inspection Reports for each day the site is visited using field notes and digital photographs. The report shall describe areas of the project that were inspected, compliance observations, any issues or observations requiring follow-up, key personnel on site, and any important meetings or discussions that took place.

Mitigation Monitoring Reports

The CPUC Monitoring Team shall prepare regular (typically biweekly) Mitigation Monitoring Reports during normal periods of construction based on review of PG&E’s Compliance Summary Reports and any CPUC Inspection Reports that were prepared during the reporting period. The Mitigation Monitoring Reports shall also include documentation of any compliance issues and track any questions or observations requiring follow-up. The frequency of Mitigation Monitoring Reports shall be determined by the CPUC Project Manager.

Final Monitoring Report

The CPUC Monitoring Team shall prepare a Final Monitoring Report following the completion of construction. The Final Monitoring Report shall include a description of mitigation monitoring throughout the project, a description of completed EPMs described in the IS/MND, and an analysis of PG&E’s compliance record. The report will evaluate the relative success of the MMCRP and describe any lessons learned. The Final Monitoring Report shall be submitted to the CPUC within 60 days after construction is completed and the CPUC has determined mitigation monitoring for the project is complete.

Project reports and their typical frequency are listed in Table 4.3-1.

Table 4.3-1: Project Reports		
Report Name	Frequency	Submission to the CPUC
PG&E Compliance Team		
Daily Inspection Reports	Each day of construction takes place on site	As requested
Compliance Summary Reports	Weekly	Once completed

**Mitigation Monitoring, Compliance, and Reporting Program
PROJECT PROCEDURES**

Final Compliance Report	Once	Within 30 days after construction is completed
CPUC Monitoring Team		
Site Inspection Reports	Each site inspection	Included with Mitigation Monitoring Reports
Mitigation Monitoring Reports	Biweekly	Once completed
Final Monitoring Report	Once	Within 60 days after construction is completed

4.4 MITIGATION EFFECTIVENESS REVIEW

CPUC may conduct a comprehensive review of EPM requirements that are not effectively mitigating project impacts at any time it deems appropriate, including as a result of the Dispute Resolution procedure outlined in Section 3.7. If CPUC determines that any EPM requirements are not adequately mitigating environmental impacts caused by the project, then CPUC may, in coordination with PG&E, develop alternative measures to effectively mitigate those impacts. Any reviews of mitigation effectiveness shall be conducted in a manner consistent with CPUC’s rules and practices.

4.5 COMPLIANCE LEVELS AND REPORTING TERMS

The project will be evaluated for compliance with EPMs and permit conditions throughout all phases of the project by both the PG&E Compliance Team and CPUC Monitoring Team. Compliance levels and reporting terms will be assigned to project observed activities or lack of activities, when required. Compliance levels and reporting terms are described in Table 4.5-1. A description, examples, and reporting requirements for each compliance level and reporting term is included in Appendix F.

The EM and EI are primarily responsible for initially reporting issues with compliance during inspection of the project site; however, problems may also be determined by other environmental personnel during review and preparation of project reports.

**Mitigation Monitoring, Compliance, and Reporting Program
PROJECT PROCEDURES**

Table 4.5-1: Compliance Levels and Reporting Term Definitions

Compliance Levels (In Order of Severity)	Reporting Terms	Definition
Level 0: Compliant	“Acceptable”	An event, or observation of activities or a work site, that was compliant with project EPMs and permit conditions.
Level 1: At risk of being out of compliance (low severity)	“Occurrence”	An event, or observation of activities or a work site, that needs to be highlighted and addressed before it deviates from project EPMs or permit conditions.
Level 2: Out of compliance (low to moderate severity)	“Minor Problem”	An event, or observation of activities or a work site, that slightly deviates from project EPMs or permit conditions, but does not put a sensitive resource at unpermitted risk.
Level 3: Out of compliance (moderate to high severity)	“Compliance Issue”	An event, or observation of activities or a work site, that slightly deviates from project EPMs or permit conditions and puts a sensitive resource at minor unpermitted risk, but is quickly corrected without impacting the resource.
Level 4: Out of compliance (high severity)	“Noncompliance”	An event, or observation of activities or a work site, that violates project EPMs, permit conditions, or MMCRP authorization requirements (e.g., NTP or minor project change approval), and result in unpermitted risk or impacts to a sensitive resource.
NOTE: Discussion notes, examples, and reporting requirements for each compliance level and reporting term are included in Appendix F.		

Notification of Incidents Regarding Compliance

Specific compliance notification protocol and timeframes are required when a project activity or worksites are determined to be out of compliance with project EPMs or permit conditions (described in Table 4.5-1 and Appendix F). In the event that a Minor Problem, Compliance Issue, or Noncompliance is documented, a written Notification of Incident shall be submitted by the reporting party (PG&E Compliance Team or CPUC Monitoring Team) to the alternate party. A Notification of Incident is required by the end of the following business day after the issue is observed. A Notification of Incident Form is included in Appendix G. Noncompliance events may require that the reporting party submit a Noncompliance Memorandum in order to describe the event in detail and describe how PG&E will bring the project back into compliance. Communication protocols for notification and reporting of compliance incidents is described in Appendix D.

Resource agencies may also require notification in the event of a noncompliance incident. Follow-up details for all noncompliance incidents, including potential delayed impacts and any actions taken, shall be included in the PG&E Compliance Summary Reports and CPUC Mitigation Monitoring Reports.

Compliance Tracking and Record Keeping

Compliance reporting shall be tracked throughout construction by both the PG&E Compliance Team and the CPUC Monitoring Team. The CPUC Monitoring Team shall provide the PG&E Compliance Team with a record of all Level 1 (Occurrence) events or higher recorded for the project that reflects both PG&E and CPUC observations. The PG&E Compliance Team shall document all Level 1 or higher events observed by their monitors as well as the CPUC Monitoring Team. A record of each event shall be included in PG&E's Compliance Summary Reports, and a final record for the entire project shall be included in the PG&E Final Compliance Report, as described in Section 4.3.

4.6 PROJECT CHANGES

The need for changes to the project may develop during construction. Any proposed changes to the project must be minor and cannot create a new environmental impact or significantly increase the severity of a known impact to maintain compliance with CEQA. Examples of potentially minor project changes, depending on location, include use of extra workspace, use of additional access roads, or substitution of a new mitigation measure to substitute for an equal or lesser mitigation requirement. Project changes may be requested for either a temporary or permanent duration. The PG&E Compliance Team and CPUC Monitoring Team shall work together to find the most appropriate solutions for project needs while meeting CEQA requirements. Procedures for reviewing project change requests are described below.

Specific communication protocols for each project change procedure are described in Appendix D, and a standard form required for any requests is included in Appendix H.

Minor Project Modifications

PG&E may submit to CPUC a request for a Minor Project Modification (MPM) for minor permanent changes to the project. PG&E must submit to CPUC a Minor Project Change Request Form (located in Appendix H) with any proposed requests. The form requires standard information about the proposed change and potential environmental impacts that may occur as a result of the change. The CPUC Monitoring Team shall review MPM requests and ensure that any approvals are consistent with CEQA requirements. A proposed MPM that has the potential to substantially increase impacts to the environment shall be evaluated to determine whether supplemental CEQA review is required. The CPUC Project Manager must sign the request to indicate approval and issue the approval to PG&E. PG&E shall include MPM requests with NTP request packages when possible, as described in Section 4.1.

Temporary Extra Work Space

A Temporary Extra Work Space (TEWS) procedure may be used to approve the temporary use (for up to 60 days) of additional storage or work space outside of the area evaluated during the CEQA process. Areas proposed for use longer than 60 days would require a MPM procedure.

**Mitigation Monitoring, Compliance, and Reporting Program
PROJECT PROCEDURES**

All TEWS requests must be submitted to the EM using the Minor Project Change Request Form (located in Appendix H). The EM shall have the authority to approve or deny use of a TEWS based on review of the request form and familiarity with the project site. PG&E must demonstrate that the TEWS is located in a previously disturbed area with no sensitive resources, is not located adjacent to land uses that could be disrupted, and that permission has been granted by the applicable landowner. A site visit to review the area may be necessary prior to approval of a TEWS request. If the CPUC EM determines the TEWS is located in a previously disturbed area with no sensitive resources or sensitive land uses and does not conflict with the CEQA document, a written approval shall be issued in the form of an email. Verbal approval may also be issued directly to the PG&E EI, but shall be followed up with written approval for documentation purposes.

Standard conditions of a TEWS approval are:

- Use of the site is temporary and limited to 60 days.
- All project activities must be in compliance with EPM requirements, permit conditions, and local ordinances such as traffic and noise ordinances.
- Work shall cease immediately and the site shall be reevaluated if any signs of cultural resources are identified.
- The proposed site shall not be used for storage of fuel or hazardous materials.
- Any complaints from the public regarding the TEWS site must be provided to the CPUC Monitoring Team.

Minor Field Change

A Minor Field Change (MFC) procedure may be used to approve simple project changes within previously approved areas that are minor in scope, reduce an impact to a resource, or increase worker safety, without increasing impacts to the environment. Examples of a potential MFC include:

- Use of a vehicle turnaround, pull-out, or passing space in a previously disturbed area
- Addition of minor extra road widths that do not require grading or clearing
- Use of an existing road segment in a previously approved work area
- Shifting a pull and tension site boundary that would not result in new or additional impacts

MFC requests shall be submitted to the EM using the Minor Project Change Request Form (located in Appendix H). The EM has the authority to approve or deny a MFC based on review of the request form and familiarity with the project site. If the EM determines the MFC is minor in scope and does not conflict with the CEQA document, a written approval shall be issued in the form of an email. Verbal approval may also be issued directly to the EI, but shall be followed up with written approval for documentation purposes. All project EPM requirements and permit conditions apply to any approved MFC.

5 MITIGATION MONITORING PROGRAM TABLE

A Mitigation Monitoring Program Table is located in Appendix B (Table B-1) that lists all project EPMs included in the IS/MND. This table is the core document for determining compliance with EPM requirements and the MMCRP. A copy of the table shall be kept on site during construction. Supervisory staff from both the PG&E Compliance Team and CPUC Monitoring Team shall be familiar with the Mitigation Monitoring Program Table contents. The table will serve as the primary document to verify and track EPM compliance for the project.

Updated versions of the table shall be exchanged between the PG&E Compliance Team and the CPUC Monitoring Team to document the implementation status of each EPM during various phases of the project, including with the submission of each NTP request, during construction as needed, and once construction is complete, when the PG&E Final Compliance Report and CPUC Final Monitoring Reports are submitted to CPUC.

How to Use the Table

The major components of Table B-1 are described below.

EPMs

APMs, AMMs, and MMs described in Section 1.2 are collectively referred to as EPMs for the purposes of the MMCRP. All EPMs for the project are listed in the Table B-1. If the context of an EPM is not clear, the reader should refer to the original source section located in the IS/MND for clarification, or initiate a discussion with the CPUC Monitoring Team.

Work Phase

Three project components or work phases are listed under this column. The following descriptions and abbreviations are used to identify the work phase that the EMP applies to:

- **SUB** = Substation construction
- **PL** = Power line construction
- **DL** = Distribution line construction

Location

The location column describes the location where the EPM applies within the project site.

Interpretation and Implementation Approach

This column summarizes key actions required to verify implementation of an EPM.

Effectiveness Criterion

The effectiveness criterion summarizes what the EPM is expected to achieve to determine compliance.

Mitigation Monitoring, Compliance, and Reporting Program
MITIGATION MONITORING PROGRAM TABLE

Responsible Parties and Required Actions

The responsible party (either PG&E or CPUC) is listed within the cell corresponding to the appropriate action(s) necessary to implement or verify implementation of EPM requirements. Six action categories were developed to describe the general range of EPM requirements that are required. One or more actions may apply to each EPM and responsibly party. The following action category abbreviations are used in the table:

- **PPP** = Submit a plan, program, or permit
- **SURV** = Submit survey results
- **DOC** = Submit written documentation verifying EPM implementation (memorandum, letter, or email correspondence)
- **REV** = Review and verify submitted plan, program, permit, or other written documentation
- **MON** = Monitor or visually verify on site
- **REP** = Verify through reporting in the PG&E Compliance Reports and CPUC Monitoring Reports

PG&E is the only party responsible for completing actions including PPP, SURV, and DOC, and the CPUC is the party responsible for completing REV. Both PG&E and the CPUC are responsible for actions including MON and REP.

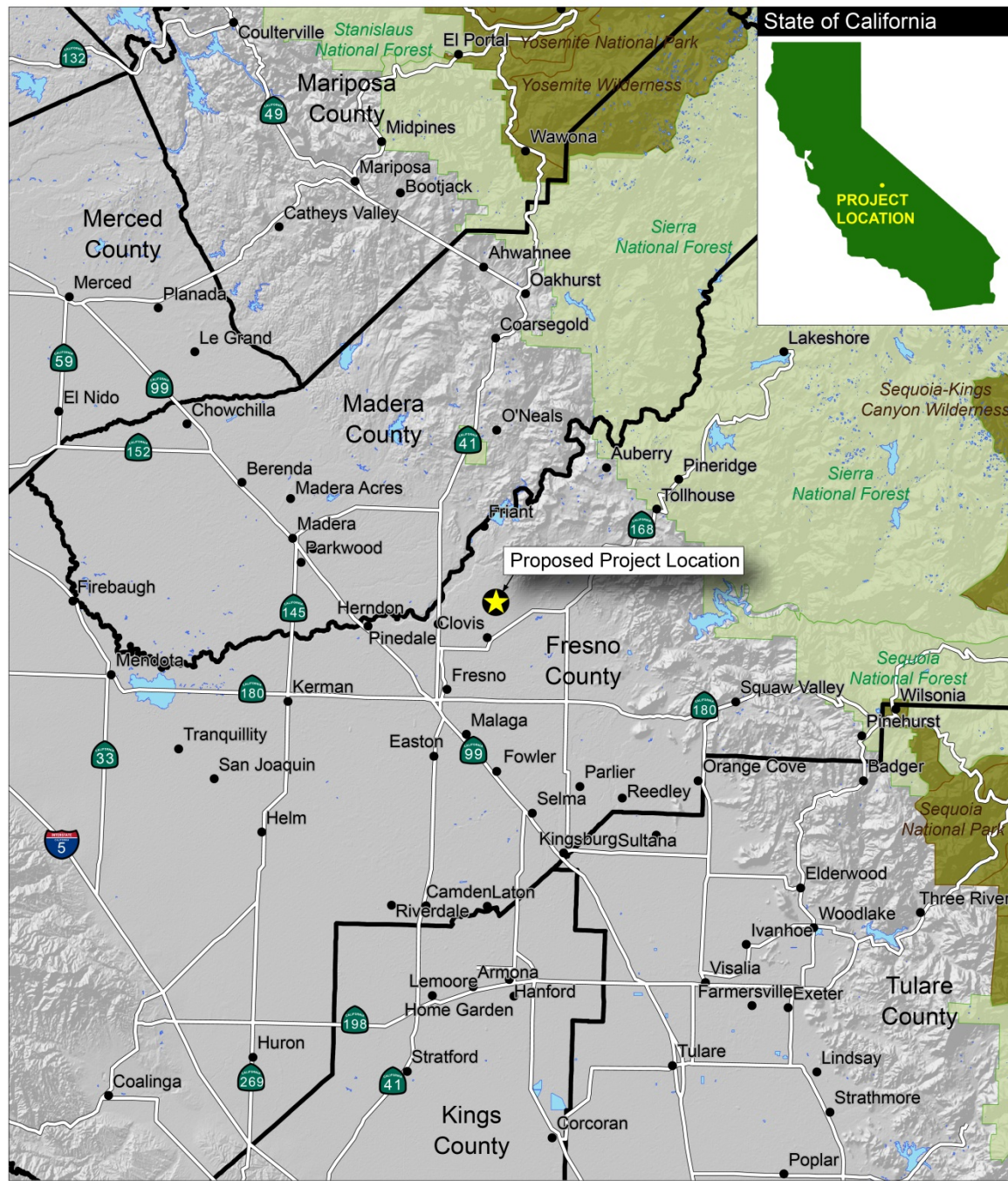
An asterisk (*) symbol in the table specifies a required action during a work phase that depends on circumstances (e.g., only if a species is identified during surveys, if a water feature is identified in a work area, if a work activity poses a potential risk to a resource, etc.).

Time Period of Action and Status

Time periods during which the EPM applies are listed on the right hand side of the table. Some EPMs contain actions that are required during multiple time periods of the project (e.g., a feature of the project may be actively monitored for compliance during construction, and confirmation of the successful completion of that particular feature may be confirmed and documented at the completion of construction). If an EPM applies during more than one time period, then each period is listed in order. This column includes room for notes on the current status of EPM implementation. PG&E shall provide updated status notes for the applicable time period, including dates and references to attached documentation, with each NTP request and with the Final Compliance Report, as described in Sections 4.1 and 4.3.

Appendix A: Project Maps

Figure A-1: Proposed Project Location

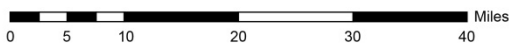


SOURCE: ESRI 2012, PG&E 2012, and Panorama Environmental 2012

Scale: 1:1,000,000

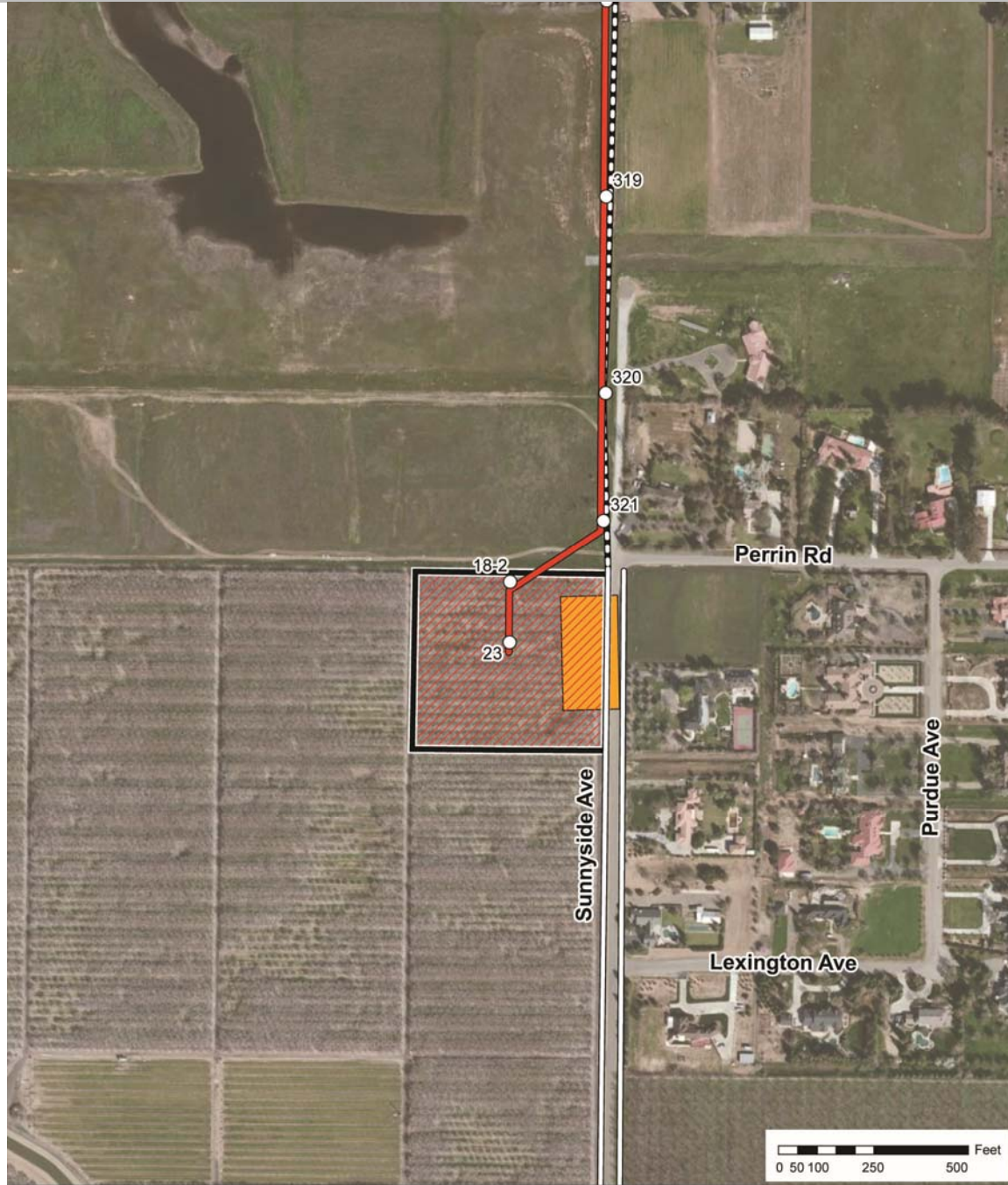
LEGEND

- Proposed Project Location
- Interstate Highway
- State Route



PANORAMA
ENVIRONMENTAL, INC.

Figure A-2: Substation Location









SOURCE: ESRI 2013, PG&E 2013, and Panorama Environmental 2013

Scale: 1:5,000

LEGEND



-  Proposed Substation
-  Proposed Power Line
-  Approximate Pull and Tension Site

-  Existing Overhead 12kV Distribution Line
-  Proposed Parallel Underground Distribution Lines
-  Proposed Pole

PANORAMA
ENVIRONMENTAL, INC.

Figure A-3: Substation Location

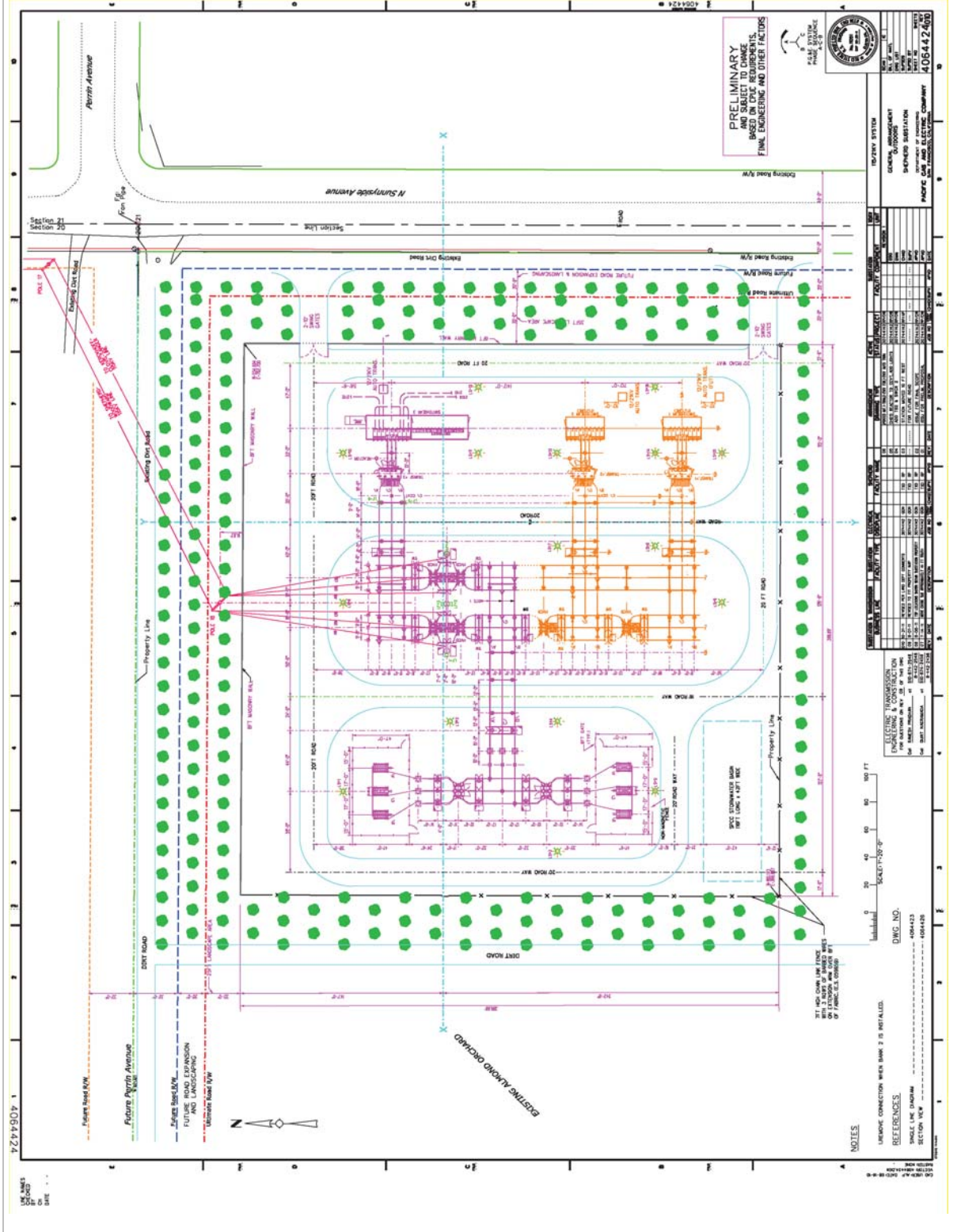


Figure A-4: Proposed Power Line and Distribution Line Alignments

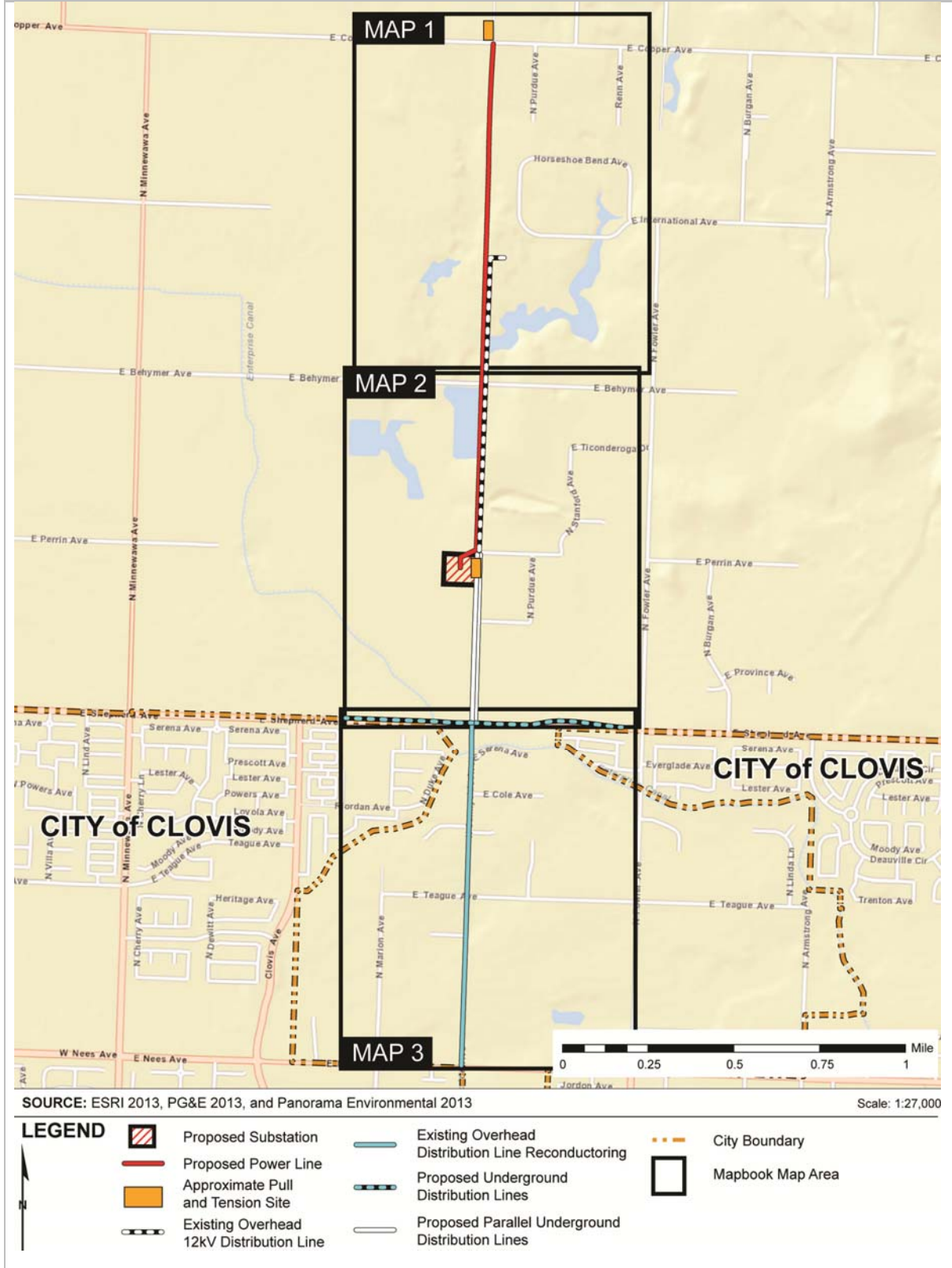
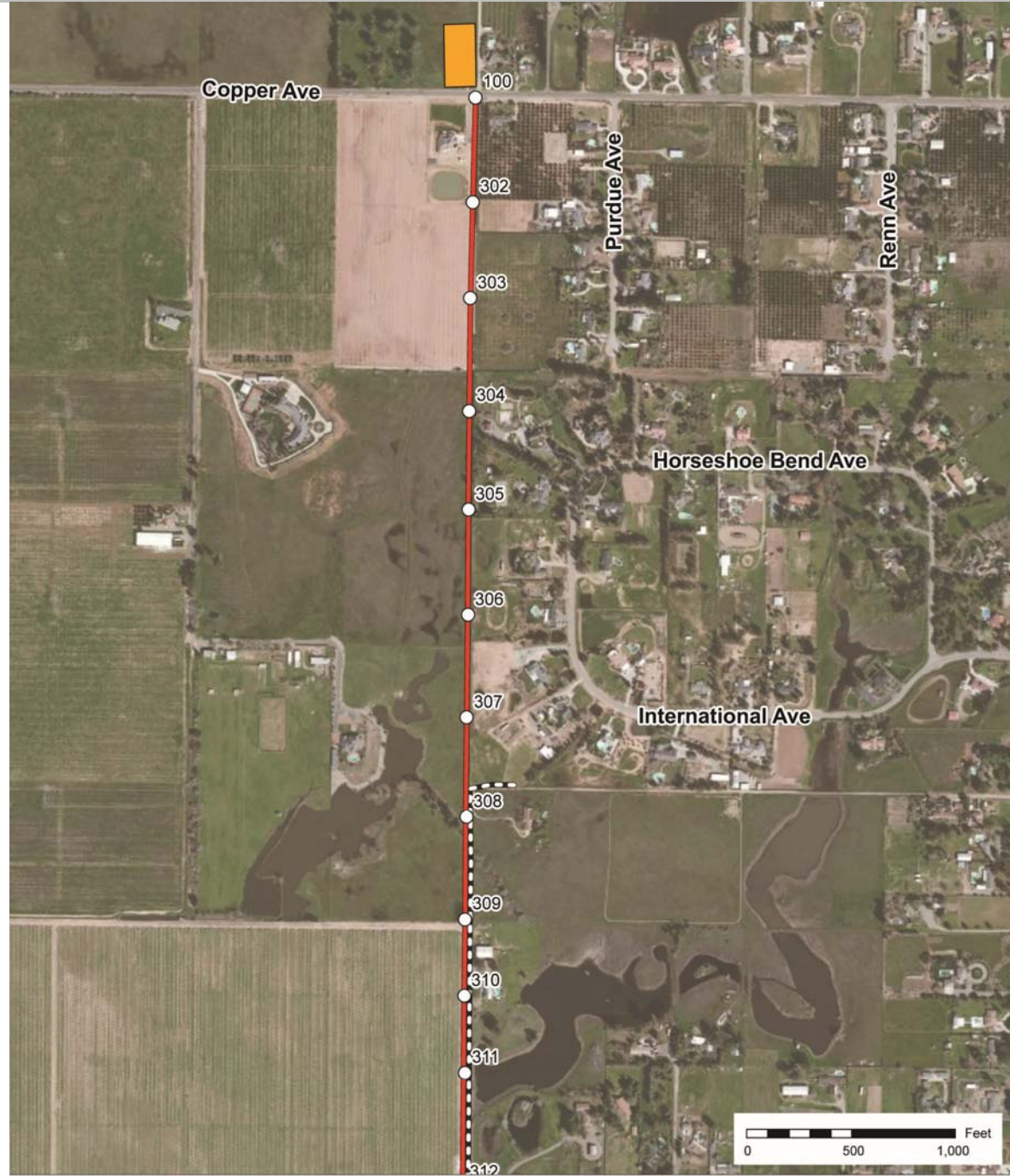


Figure A-5: Proposed Power Line and Distribution Line Alignments Map 1



SOURCE: ESRI 2013, PG&E 2013, and Panorama Environmental 2013

Scale: 1:9,000

LEGEND











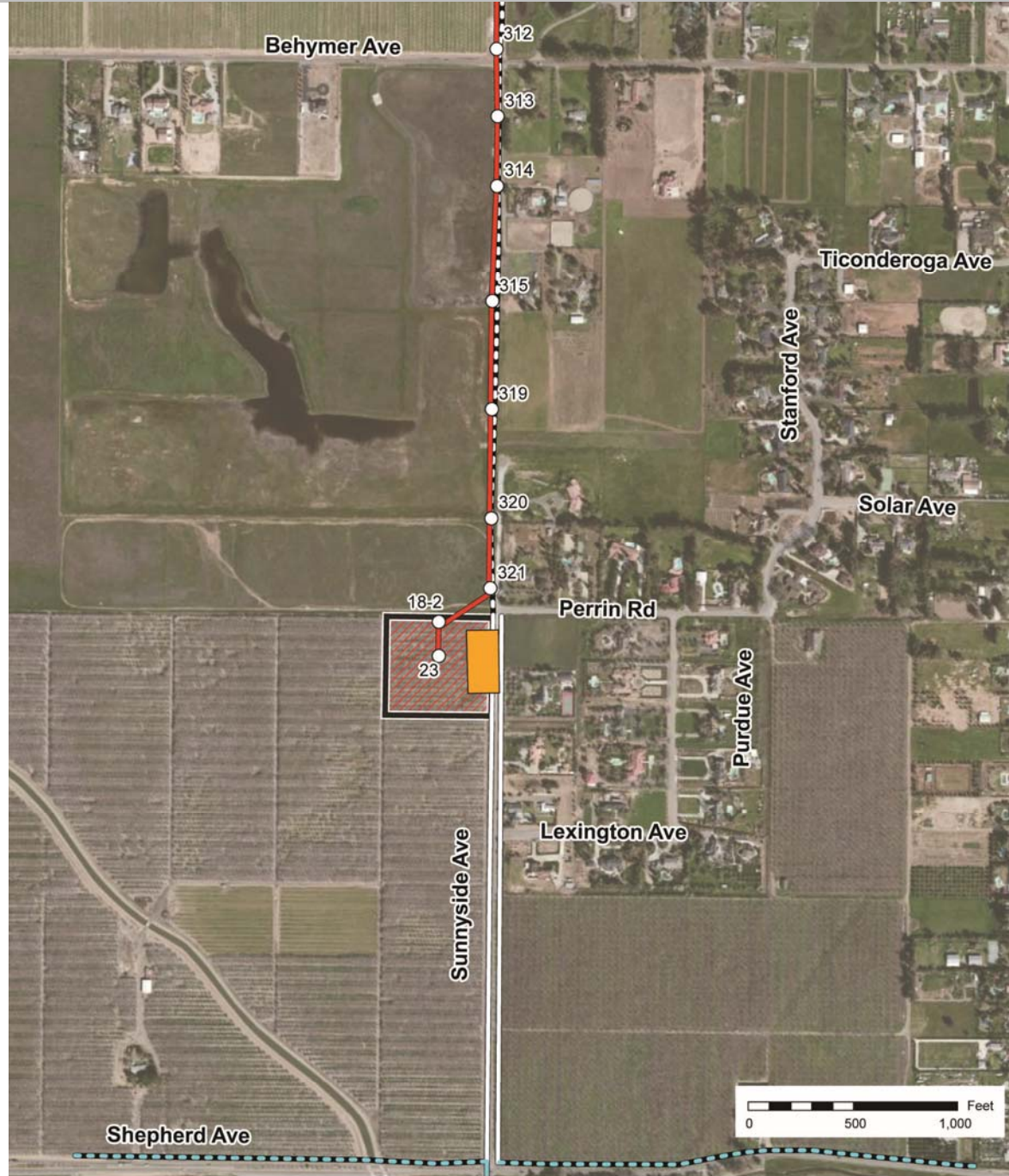
- | | | | | | |
|---|--|---|--|---|---------------|
|  | Proposed Substation |  | Existing Overhead Distribution Line Reconductoring |  | Proposed Pole |
|  | Proposed Power Line |  | Proposed Underground Distribution Lines | | |
|  | Approximate Pull and Tension Site |  | Proposed Parallel Underground Distribution Lines | | |
|  | Existing Overhead 12KV Distribution Line | | | | |



Figure A-6: Proposed Power Line and Distribution Line Alignments Map 2










SOURCE: ESRI 2013, PG&E 2013, and Panorama Environmental 2013

Scale: 1:9,000

LEGEND



-  Proposed Substation
-  Proposed Power Line
-  Approximate Pull and Tension Site
-  Existing Overhead 12kV Distribution Line

-  Existing Overhead Distribution Line Reconductoring
-  Proposed Underground Distribution Lines
-  Proposed Parallel Underground Distribution Lines

-  Proposed Pole

PANORAMA
ENVIRONMENTAL, INC.

Figure A-7: Proposed Power Line and Distribution Line Alignments Map 3










SOURCE: ESRI 2013, PG&E 2013, and Panorama Environmental 2013


Scale: 1:9,000

LEGEND



-  Proposed Substation
-  Proposed Power Line
-  Approximate Pull and Tension Site
-  Existing Overhead 12kV Distribution Line

-  Existing Overhead Distribution Line Reconductoring
-  Proposed Underground Distribution Lines
-  Proposed Parallel Underground Distribution Lines

-  Proposed Pole

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Appendix B: Mitigation Monitoring Program Table

Mitigation Monitoring, Compliance, and Reporting Program

Table B-1: Mitigation Monitoring Program Table

Project EPMs (APMs, AMMs, and MMs)	Work Phase ^A	Location	Interpretation and Implementation Approach	Effectiveness Criterion	Responsible Parties	Required Actions ^B	Implementation Period and Status
Aesthetics							
APM Visual-1: Construct a prefabricated concrete wall on the north and east sides of the substation and replanting as necessary to leave three rows of trees on the east and north sides of the substation or comparable visual screening to minimize contrast with the existing visual character of the area. As almond trees die, or are impacted by road widening along Sunnyside and Perrin Avenues, the trees will be replaced with compatible vegetation or comparable visual screening.	SUB	North and east sides of the substation	Confirm wall construction and visual screening east and north of the substation remain.	Concrete wall and visual screening east and north of the substation present.	PG&E	MON REP	II. During Construction: <i>To be updated</i>
					CPUC	MON REP	
APM Visual-2: Security lighting will consist of sodium vapor lamps and all exterior lighting will use non-glare light bulbs, designed and positioned to minimize casting light and/or glare to off-site locations. Security lighting will be designed at the substation in a way such that all lighting is directed inwards. In addition, all exterior lighting will be hooded to reduce light pollution.	SUB	Substation	Confirm that sodium vapor lamps and non-glare bulbs are installed. Confirm security lighting is directed inward and is hooded.	Described lighting system installed.	PG&E	DOC	II. During Construction: <i>To be updated</i>
					CPUC	REV	
MM Aesthetics-1. The final color of the pre-fabricated concrete walls shall be chosen in consultation with the Fresno County.	SUB	North and east sides of the substation	Consult County regarding concrete wall color.	County-approved concrete wall color used.	PG&E	DOC MON	I. Prior to Construction: <i>To be updated</i>
					CPUC	REV MON	
MM Aesthetics-2. To reduce the contrast and presence of the substation and related facilities: <ul style="list-style-type: none"> Non-reflective finishes shall be used on fencing and all facilities taller than 8 feet. Entrance road solid gates shall be a natural wood color. 	SUB	Substation	Confirm that finishes are non-reflective and that gates are a natural wood color.	Described non-reflective surfaces used.	PG&E	DOC MON	II. During Construction: <i>To be updated</i>
					CPUC	REV MON	
MM Aesthetics-3. To reduce the contrast and presence of the power line and circuits, PG&E shall use non-specular conductors and galvanized steel TSPs.	PL	Project power lines and TSPs	Confirm use of non-specular conductors and galvanized steel TSPs.	Described non-reflective equipment installed.	PG&E	DOC MON	I. Prior to Construction: <i>To be updated</i> II. During Construction: <i>To be updated</i>
					CPUC	REV MON	
Air Quality							
APM Air-1: All disturbed areas that are not being actively used for construction purposes will be stabilized of dust emissions using water or covered with a tarp or other suitable covering.	SUB PL DL	All inactive disturbed areas	Visually inspect inactive disturbed areas to confirm stabilization measures have been applied. Stabilize disturbed areas that are not being used.	Disturbed areas that are inactive do not emit dust.	PG&E	MON	II. During Construction: <i>To be updated</i>
					CPUC	MON	
APM Air-2: All unpaved roads utilized for accessing the project will be stabilized by spraying with water.	SUB PL	Unpaved access roads being used for site access	Visually inspect stabilization of unpaved roads.	Unpaved roads do not emit dust.	PG&E	MON	II. During Construction: <i>To be updated</i>
					CPUC	MON	
APM Air-3: All ground-disturbing activities will be effectively controlled of fugitive dust emissions by application of water or by presoaking.	SUB PL DL	Where ground-disturbing activity is occurring	Visually inspect to verify control of fugitive dust emissions.	Areas undergoing ground-disturbing activities do not emit dust.	PG&E	MON	II. During Construction: <i>To be updated</i>
					CPUC	MON	

Mitigation Monitoring, Compliance, and Reporting Program

Table B-1: Mitigation Monitoring Program Table

Project EPMs (APMs, AMMs, and MMs)	Work Phase ^A	Location	Interpretation and Implementation Approach	Effectiveness Criterion	Responsible Parties	Required Actions ^B	Implementation Period and Status
APM Air-4: When materials are transported off site, all material will be covered or wetted to limit visible dust emissions, and at least 6 inches of freeboard space from the top of the container shall be maintained.	SUB	Vehicles being used for off-site material transport	Visually inspect that material transportation complies with the measure.	Off-site material transportation does not emit dust.	PG&E	MON	II. During Construction: <i>To be updated</i>
	PL				CPUC	MON	
APM Air-5: All operations will remove the accumulation of mud or dirt from adjacent public streets at the end of each workday.	SUB	Public streets adjacent to the site	Visual inspection to verify streets are cleaned of mud and dirt.	Public streets clean of project-related mud and dirt.	PG&E	MON	II. During Construction: <i>To be updated</i>
	PL				CPUC	MON	
APM Air-6: Trackout (i.e., dirt and mud transported on vehicle tires and transferred to the pavement upon exiting the work area) will be removed at the end of each workday when it extends 50 or more feet from the site.	SUB	Public streets adjacent to the site	Visually inspect roadways around project site for trackout.	No trackout present more than 50 feet outside site boundaries.	PG&E	MON	II. During Construction: <i>To be updated</i>
	PL				CPUC	MON	
APM Air-7: Speeds of vehicles and equipment operating on unpaved surfaces will be limited to no more than 15 miles per hour, and as required in the project dust control permit.	SUB	All unpaved surfaces	Verify that vehicles and equipment maintain speeds below 15 miles per hour.	No vehicles travel at speeds greater than 15 miles per hour on unpaved surfaces.	PG&E	MON	II. During Construction: <i>To be updated</i>
	PL				CPUC	MON	
APM Air-8: Dust suppressants or watering will be used to ensure that dust is controlled to less than 20 percent opacity when winds exceed 20 miles per hour.	SUB	Disturbed areas and unpaved surfaces	Visually inspect that dust is controlled to less than 20 percent opacity.	Dust is less than 20 percent opacity.	PG&E	MON	II. During Construction: <i>To be updated</i>
	PL				CPUC	MON	
MM Air-1: All disturbed surface areas over 1,000 square feet must achieve final stabilization upon the completion of project construction. Final stabilization would be achieved through appropriate means that would provide long-term sediment and dust control. PG&E will be responsible for monitoring and maintaining all disturbed areas until final stabilization is achieved.	SUB	Disturbed areas >1,000 square feet	Visually inspect for permanent stabilization.	Work areas are permanently stabilized.	PG&E	MON	III. Post-Construction: <i>To be updated</i>
	PL				CPUC	MON	
Greenhouse Gases							
APM GHG-1/Noise-5: When not performing construction, operation, or maintenance activities, vehicles will be shut off rather than left idling unnecessarily. Some equipment or vehicles may require extended start-up times. For such equipment, a common sense approach will be used to determine idling times. Normal idling will not exceed five minutes, as required by California law.	SUB	Idling vehicles; various locations	Verify that vehicles are not left idling more than 5 minutes.	No idling greater than 5 minutes occurs, with exception of specific equipment or vehicles that require extended start-up time.	PG&E	MON	II. During Construction: <i>To be updated</i>
	PL				CPUC	MON	
APM GHG-2: Diesel fueled off-road construction equipment with 50 horsepower or greater engines shall at a minimum meet U.S. Environmental Protection Agency (EPA) and California Air Resources Board (CARB) Tier 1 engine standards. Compliance records will be kept by the general construction contractor. This APM is not applicable to equipment permitted by the local air quality district or certified through CARB's Statewide Portable Equipment Registration Program, or single specialized equipment that will be used for less than five total days.	SUB	N/A	Verify that compliance records are kept by general contractor.	All compliance records kept on file.	PG&E	DOC	II. During Construction: <i>To be updated</i>
	PL				CPUC	REV	
DL							

Mitigation Monitoring, Compliance, and Reporting Program

Table B-1: Mitigation Monitoring Program Table

Project EPMs (APMs, AMMs, and MMs)	Work Phase ^A	Location	Interpretation and Implementation Approach	Effectiveness Criterion	Responsible Parties	Required Actions ^B	Implementation Period and Status
APM GHG-3: PG&E will incorporate the following measures into its construction plans to further reduce greenhouse gas emissions: <ul style="list-style-type: none"> Encourage construction workers to carpool by establishing carpooling to construction sites where feasible to do so. Encourage recycling of construction waste. Minimize welding and cutting by using compression of mechanical applications where practical and within standards. 	SUB	N/A	Verify that WEAP contains encouragement of carpooling and recycling of construction waste. welding/cutting minimization.	Construction plans incorporate specified measures.	PG&E	DOC	<u>II. During Construction:</u> <i>To be updated</i>
	PL				CPUC	REV	
APM GHG-4: PG&E will continue to be an active member of the SF ₆ Emission Reduction Partnership, which focuses on reducing emissions of sulfur hexafluoride (SF ₆) from transmission and distribution sources. PG&E will also continue to institute new rules for more accurately monitoring its equipment for SF ₆ leaks and immediately repairing leaks that are discovered. PG&E will ensure that all breakers purchased for this project will have a manufacturer's guaranteed SF ₆ leakage rate of 0.5 percent per year or less.	SUB	N/A	Verify that all breakers have a manufacturer's guaranteed SF ₆ leakage rate of 0.5 percent per year or less.	Appropriate breakers installed.	PG&E	DOC	<u>II. During Construction:</u> <i>To be updated</i>
	DL				CPUC	REV	
Biological Resources							
APM Bio-2: To prevent the spread of noxious weeds, only equipment which has been washed and is free of caked on mud, dirt, and other debris which could house plant seeds will be allowed in the project area.	SUB	All work areas	Wash vehicles and equipment prior to mobilizing to the project site to prevent the spread of noxious weeds.	Vehicles and equipment adequately washed and free of caked on mud, dirt, and other debris.	PG&E	DOC MON REP	<u>II. During Construction:</u> <i>To be updated</i>
	PL				CPUC	REV MON REP	
APM Bio-6: In accordance with, and in addition to the training requirements in AMM 1 of the PG&E San Joaquin Valley Habitat Conservation Plan (HCP), worker environmental awareness training will be conducted prior to initiating project construction activities and throughout the duration of construction, such that all new site workers have received training. Worker training will detail sensitive species of the project area and those conservation measures which have been identified to minimize impacts to them. In addition, workers will be informed about the presence, life history, and habitat of these species. Training will also include information on federal and state laws protecting migratory birds. Documentation of worker training will be available on-site.	SUB	N/A	Implement worker environmental training program with described material prior to and throughout construction.	All workers have received adequate training for their positions.	PG&E	PPP DOC	<u>I. Prior to Construction:</u> <i>To be updated</i> <u>II. During Construction:</u> <i>To be updated</i>
	PL				CPUC	REV	
APM Bio-7: In accordance with the monitoring requirements in AMMs 15 and 17 of the HCP, a biological monitor will be onsite during ground disturbing activities with the potential to disturb habitat near flagged exclusion and restricted activity zones in order to minimize impacts to salamanders. Before the start of work each morning, the biological monitor will check under all equipment and stored supplies left in the work area overnight within 600 feet of suitable habitat for listed species with a potential to occur in the area. The monitor will have the authority to stop work or determine alternative work practices in consultation with agencies and construction personnel, as appropriate, if construction activities are likely to impact sensitive biological resources. The biological monitor will document monitoring activities in a daily log summarizing construction activities and environmental compliance.	SUB	Adjacent to salamander habitat and project work areas within 600 feet of suitable habitat for listed species with a potential to occur in the area (described in the IS/MND)	Before the start of work each morning, perform biological inspection ("clearance") under all equipment and materials stored overnight. Monitor ground-disturbing activities near sensitive Salamander habitat. Stop work if construction is likely to impact a sensitive biological resource.	Biological monitor is present during ground-disturbing activities, and biological clearances are conducted.	PG&E	MON REP	<u>II. During Construction:</u> <i>To be updated</i>
	PL				CPUC	MON REP	

Mitigation Monitoring, Compliance, and Reporting Program

Table B-1: Mitigation Monitoring Program Table							
Project EPMs (APMs, AMMs, and MMs)	Work Phase ^A	Location	Interpretation and Implementation Approach	Effectiveness Criterion	Responsible Parties	Required Actions ^B	Implementation Period and Status
APM Bio-8: All work will be done in a manner that minimizes disturbance to wildlife and habitat.	SUB	All work areas	Minimize impacts to wildlife and habitat.	Impacts reduced as possible.	PG&E	MON	<u>II. During Construction:</u> <i>To be updated</i>
	PL				CPUC	MON	
APM Bio-9: All food waste and associated containers will be disposed of in closed lid containers.	SUB	All work areas	Store trash in closed lid containers and remove from the site regularly.	Trash disposed of as described.	PG&E	MON	<u>II. During Construction:</u> <i>To be updated</i>
	PL				CPUC	MON	
APM Bio-11: Proper spill prevention and cleanup equipment shall be readily available.	SUB	All work areas	Retain spill kits with each crew or in each work area.	Spill kits are available.	PG&E	MON	<u>II. During Construction:</u> <i>To be updated</i>
	PL				CPUC	MON	
APM Bio-12: Where work on pavement, existing roads, and existing disturbed areas is not practicable, worker vehicles and construction equipment shall remain on identified access routes, and designated areas for construction. If additional areas are required, a biologist will survey the new area, identify any sensitive biological resource, and flag that resource for avoidance.	SUB	All work areas	Keep equipment and vehicles within approved areas. Conduct surveys for any additional workspaces (refer to the MMCRP for workspace changes).	Equipment and vehicles located within approved areas.	PG&E	SURV* DOC* MON	<u>II. During Construction:</u> <i>To be updated</i>
	PL				CPUC	REV* MON	
APM Bio-13: No pets or firearms are permitted within the project area.	SUB	All work areas	No pets or firearms.	No pets or firearms are on site.	PG&E	MON	<u>II. During Construction:</u> <i>To be updated</i>
	PL				CPUC	MON	
APM Bio-14: Sensitive areas will be clearly flagged or marked. Sensitive areas will be avoided during construction unless the necessary agency permits and/or approvals have been obtained.	PL	Sensitive areas	Mark sensitive areas for avoidance until agency approved access is granted.	Sensitive areas are marked and avoided, unless permits have been obtained.	PG&E	MON REP	<u>I. Prior to Construction:</u> <i>To be updated</i> <u>II. During Construction:</u> <i>To be updated</i>
	DL				CPUC	MON REP	
APM Bio-18: All pole holes will be backfilled or covered at the end of the work day by a method that would restrict any wildlife from entering the hole from the surface, and to prevent human injury.	SUB	Around all pole holes	At the end of the work day, cover holes to prevent any wildlife from entering the whole, or causing human injury.	Holes are adequately covered.	PG&E	MON REP	<u>II. During Construction:</u> <i>To be updated</i>
	PL				CPUC	MON REP	
APM Bio-19: PG&E will consider the location of seasonal wetlands in the design of the power line. No power line poles will be placed in seasonal wetlands. Prior to construction the perimeter of the seasonal wetland near project construction will be flagged for avoidance.	PL	Seasonal wetlands	Avoid seasonal wetlands.	Poles and work areas avoid seasonal wetlands.	PG&E	DOC MON REP	<u>I. Prior to Construction:</u> <i>To be updated</i> <u>II. During Construction:</u> <i>To be updated</i>
					CPUC	REV MON REP	

Mitigation Monitoring, Compliance, and Reporting Program

Table B-1: Mitigation Monitoring Program Table

Project EPMs (APMs, AMMs, and MMs)	Work Phase ^A	Location	Interpretation and Implementation Approach	Effectiveness Criterion	Responsible Parties	Required Actions ^B	Implementation Period and Status
APM Bio-20: Suitable habitat areas (i.e., seasonal wetlands, ponds, and canals) within the project area will be identified during preconstruction surveys. These areas will be mapped and clearly marked in the field, and will be avoided during construction.	PL DL	Water features	Survey, map, and avoid all water features.	Water features surveyed by a qualified biologist have been mapped and avoided.	PG&E	SURV DOC MON REP	<u>I. Prior to Construction:</u> <i>To be updated</i> <u>II. During Construction:</u> <i>To be updated</i>
					CPUC	REV MON REP	
APM Bio-22: Additional conservation measures and/or mitigation recommended by the USFWS and CDFG through consultation for the California tiger salamander will be incorporated into the project. Any APMs that conflict with permits issued by the USFWS and/or CDFG will be superseded by those resource agency permit requirements.	PL	N/A (see AMMs below)	HCP amended to include coverage for California tiger salamander.	HCP implementation (see AMMs below)	PG&E	PPP* DOC MON REP	<u>I. Prior to Construction:</u> <i>PG&E provided notification that the HCP was amended to include State take authorization for California tiger salamander for work conducted on the project power and distribution lines. No additional measures will be implemented.</i> <u>II. During Construction:</u> <i>N/A (see AMMs below)</i>
					CPUC	REV MON REP	
APM Bio-24: Avian Power Line Interaction Committee Guidelines in accordance with the Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 2006 ¹ will be incorporated into the power line design to minimize the likelihood of avian electrocutions.	PL	Power line locations	Incorporate avian protection standards into the power line design.	Avian protection standards incorporated.	PG&E	DOC	<u>I. Prior to Construction:</u> <i>To be updated</i>
					CPUC	REV	
APM Bio-25: To the extent that the terms of these APMs conflict with subsequently negotiated terms and conditions of any state and/or federal environmental permit, the subsequent permit conditions will supersede the terms of these APMs.	SUB PL DL	N/A	Permit conditions are proposed to supersede project APMs.	APMs and permit conditions implemented.	PG&E	PPP* DOC*	<u>I. Prior to Construction:</u> <i>To be updated</i>
					CPUC	REV*	
AMM 1: Employees and contractors performing O&M activities will receive ongoing environmental education. Training will include review of environmental laws and guidelines that must be followed by all personnel to reduce or avoid effects on covered species during O&M activities.	PL	N/A	Prepare training program and provide environmental worker training.	Workers have received environmental training.	PG&E	DOC MON REP	<u>I. Prior to Construction:</u> <i>To be updated</i> <u>II. During Construction:</u> <i>To be updated</i>
					CPUC	REV MON REP	
AMM 2: Vehicles and equipment will be parked on pavement, existing roads, and previously disturbed areas to the extent practicable.	PL	Power line work areas	Park on paved surfaces as practicable.	Previously disturbed areas used for parking, and new disturbance minimized.	PG&E	MON	<u>II. During Construction:</u> <i>To be updated</i>
					CPUC	MON	
AMM 3: The development of new access and ROW roads by PG&E will be minimized, and clearing vegetation and blading for temporary vehicle access will be avoided to the extent practicable.	PL	Power line work areas	Minimize the development of new roads.	New roads minimized. Vegetation clearing avoided as possible.	PG&E	MON	<u>II. During Construction:</u> <i>To be updated</i>
					CPUC	MON	

¹ Avian Power Line Interaction Committee. 2006. Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006. Edison Electric Institute, APLIC, and the California Energy Commission. Washington, DC, and Sacramento, California.

Mitigation Monitoring, Compliance, and Reporting Program

Table B-1: Mitigation Monitoring Program Table							
Project EPMs (APMs, AMMs, and MMs)	Work Phase ^A	Location	Interpretation and Implementation Approach	Effectiveness Criterion	Responsible Parties	Required Actions ^B	Implementation Period and Status
AMM 4: Vehicles will not exceed a speed limit of 15 mph in the ROWs or on unpaved roads within sensitive land-cover types.	PL	Power line work areas	Remain on approved roads and follow 15 mph speed limit on unpaved surfaces.	Vehicle speeds do not exceed 15 mph.	PG&E	MON	II. During Construction: <i>To be updated</i>
					CPUC	MON	
AMM 5: Trash dumping, firearms, open fires (such as barbecues) not required by the O&M activity, hunting, and pets (except for safety in remote locations) will be prohibited in O&M work activity sites.	PL	Power line work areas	Prohibit dumping, firearms, open fires, hunting, and pets.	Work activity sites free of dumping, firearms, open fires, hunting, and pets.	PG&E	MON	II. During Construction: <i>To be updated</i>
					CPUC	MON	
AMM 6: No vehicles will be refueled within 100 feet of a wetland, stream, or other waterway unless a bermed and lined refueling area is constructed.	PL	Power line alignment	Refuel only over secondary containment within 100 feet of a water feature.	Secondary containment used if refueling occurs within 100 feet of water feature.	PG&E	MON	II. During Construction: <i>To be updated</i>
					CPUC	MON	
AMM 7: During any reconstruction of existing overhead electric facilities in areas with a high risk of wildlife electrocution (e.g., nut/fruit orchards, riparian corridors, areas along canal or creek banks, PG&E's raptor concentration zone [RCZ]), PG&E will use insulated jumper wires and bird/animal guards for equipment insulator bushings or will construct lines to conform to the latest revision of PG&E's Bird and Wildlife Protection Standards.	PL	Overhead power line	Conform power line design to latest revision of PG&E's Bird and Wildlife Protection Standards, or install bird/animal guards in sensitive habitat.	Power line design conforms to latest revision of PG&E's Bird and Wildlife Protection Standards, or bird/animal guards installed in sensitive habitat.	PG&E	DOC	II. During Construction: <i>To be updated</i>
					CPUC	REV	
AMM 9: Erosion control measures will be implemented where necessary to reduce erosion and sedimentation in wetlands, waters of the United States, and waters of the state, and habitat occupied by covered animal and plant species when O&M activities are the source of potential erosion problems.	PL	Power line work areas	Implement erosion controls to prevent sedimentation in wetlands, waters of the US, and waters of the state.	Sediment discharges prevented through use of erosion control BMPs.	PG&E	MON REP	II. During Construction: <i>To be updated.</i>
					CPUC	MON REP	
AMM 10: If an activity disturbs more than 0.25 acre in a grassland, and the landowner approves or it is within PG&E rights and standard practices, the area should be returned to pre-existing conditions and broadcast-seeded using a commercial seed mix. Seed mixtures/straw used for erosion control on projects of all sizes within grasslands will be certified weed-free. PG&E shall not broadcast (or apply in other manner) any commercial seed or seed-mix to disturbance sites within other natural land-cover types, within any vernal pool community, or within occupied habitat for any plant covered species.	PL	Disturbed grassland work areas greater than 0.25 acre	Determine if disturbed grassland areas are greater than 0.25 acre. Restore such disturbed areas to pre-existing conditions with weed-free seed mix and erosion controls	Disturbed grassland greater than 0.25 acre restored.	PG&E	DOC MON*	III. Post-Construction: <i>To be updated</i>
					CPUC	REV MON*	
AMM 12: If a covered plant species is present, a qualified biologist will stake and flag exclusion zones of 100 feet around plant occupied habitat (both the standing individuals and the seed bank individuals) of the covered species prior to O&M activities ² . (Note: AMM 11 addresses elderberry plants and valley elderberry longhorn beetle.)	PL*	100 feet around special-status plant occupied habitat	Determine if special-status plants are present. Stake and flag 100-foot exclusion zone around occupied special-status plant habitat.	Exclusion zones around special-status plant habitat avoided.	PG&E	DOC MON* REP*	I. Prior to Construction: <i>To be updated</i> II. During Construction: <i>To be updated</i>
					CPUC	REV MON* REP*	

²If an exclusion zone cannot extend the specified distance from the habitat, the biologist will stake and flag a restricted activity zone of the maximum practicable distance from the exclusion zone around the habitat. This exclusion zone distance is a guideline that may be modified by a qualified biologist, based on site-specific conditions (including habituation by the species to background disturbance levels). Measures are practicable where physically possible and not conflicting with other regulatory obligations or safety considerations; O&M activities will be prohibited or greatly restricted within restricted activity zones. However, vehicle operation on existing roads and foot travel will be permitted. A qualified biologist will monitor O&M activities near flagged exclusion and restricted activity zones. Within 60 days after O&M activities have been completed at a given worksite, all staking and flagging will be removed.

Mitigation Monitoring, Compliance, and Reporting Program

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Project EPMs (APMs, AMMs, and MMs)	Work Phase ^A	Location	Interpretation and Implementation Approach	Effectiveness Criterion	Responsible Parties	Required Actions ^B	Implementation Period and Status
AMM 13: If a covered annual plant species is present, O&M activities will occur after plant senescence and prior to the first significant rain to the extent practicable.	PL*	Where special-status annual plants are present	Avoid impacting special-status annual plants before they reach an advanced state and prior to the first rain.	Special-status annual plants avoided during sensitive periods.	PG&E	DOC MON* REP*	II. During Construction: <i>To be updated</i>
					CPUC	REV MON* REP*	
AMM 14: If a covered plant species is present, the upper 4 inches of topsoil will be stockpiled separately during excavations. When this topsoil is replaced, compaction will be minimized to the extent consistent with utility standards. (This measure will be used as an AMM for narrow endemic plants only after approval by USFWS and DFG during the Confer Process.)	PL*	Where special-status plants are present	Determine if there are special-status plant species in work areas. Collect topsoil where excavations occur in special-status plant habitat, stockpile separately, and replace once work is completed. Impacts to narrow endemic plants require USFWS and CDFW approval.	Topsoil containing special-status plant seeds returned to excavated areas.	PG&E	DOC MON* REP*	I. Prior to Construction: <i>To be updated</i> II. During Construction: <i>To be updated</i>
					CPUC	REV MON* REP*	
AMM 15: If vernal pools are present, a qualified biologist will stake and flag an exclusion zone prior to O&M activities. The exclusion zone will encompass 250 feet ² . Work will be avoided after the first significant rain until June 1, or until pools remain dry for 72 hours.	PL*	Within 250 feet from vernal pools	Determine if vernal pools are present. Stake and flag exclusion zones around vernal pools until they remain dry for 72 hours.	250-foot exclusion zones around vernal pools avoided when wet.	PG&E	SURV MON* REP*	I. Prior to Construction: <i>To be updated</i> II. During Construction: <i>To be updated</i>
					CPUC	REV MON* REP*	
AMM 17: If suitable habitat for covered amphibians and reptiles is present and protocol-level surveys have not been conducted, a qualified biologist will conduct preconstruction surveys prior to O&M activities involving excavation. If necessary, barrier fencing will be constructed around the work site to prevent reentry by the covered amphibians and reptiles. A qualified biologist will stake and flag an exclusion zone of 50 feet around the potentially occupied habitat ² . No monofilament plastic will be used for erosion control in the vicinity of listed amphibians and reptiles. Barrier fencing will be removed upon completion of work. Crews will also inspect trenches left open for more than 24 hours for trapped amphibians and reptiles. A qualified biologist will be contacted before trapped amphibians or reptiles (excluding blunt-nosed leopard lizard and limestone salamander) are moved to nearby suitable habitat.	SUB* ³ PL*	Suitable habitat for special-status reptiles and amphibians	Conduct survey for special-status reptiles and amphibians, as needed. Erect barrier fencing necessary to prevent entry of special-status reptiles and amphibians to work sites. Inspect trenches left open for more than 24 hours.	Surveys completed by qualified biologist. Necessary protection fencing used and excavations inspected.	PG&E	SURV* DOC MON* REP*	I. Prior to Construction: <i>To be updated</i> II. During Construction: <i>To be updated</i> III. Upon Completion of Construction: <i>To be updated</i>
					CPUC	REV MON* REP*	

³ PG&E committed to implement AMM 17 for work associated with construction of the substation on April 06, 2012 through consultation with USFWS and CDFW. PG&E is not exempt from not be exempt from Section 9 prohibitions against take of listed species for the substation construction. PG&E has elected to implement monitoring and or exclusion fencing, as needed, to reduce any risk for impacting listed species.

Mitigation Monitoring, Compliance, and Reporting Program

Table B-1: Mitigation Monitoring Program Table

Project EPMs (APMs, AMMs, and MMs)	Work Phase ^A	Location	Interpretation and Implementation Approach	Effectiveness Criterion	Responsible Parties	Required Actions ^B	Implementation Period and Status
AMM 18: If western burrowing owls are present at the site, a qualified biologist will work with O&M staff to determine whether an exclusion zone of 160 feet during the non-nesting season and 250 feet during the nesting season can be established. If it cannot, an experienced burrowing owl biologist will develop a site-specific plan (i.e., a plan that considers the type and extent of the proposed activity, the duration and timing of the activity, the sensitivity and habituation of the owls, and the dissimilarity of the proposed activity with background activities) to minimize the potential to affect the reproductive success of the owls.	PL*	Within 160/250 feet from occupied burrowing owl burrows	Conduct survey for burrowing owls. Developed 160/250-foot exclusion zone around occupied burrows. Qualified biologist shall prepare a site-specific plan to address work within exclusion zones.	Surveys completed by qualified biologist. Exclusion zones used or site-specific plan implemented.	PG&E	SURV MON* REP*	<u>I. Prior to Construction:</u> <i>To be updated</i> <u>II. During Construction:</u> <i>To be updated</i>
					CPUC	REV MON* REP*	
AMM 19: If a Swainson's hawk nest or white-tailed kite nest is known to be within 0.25 mile of a planned worksite, a qualified biologist will evaluate the effects of the planned O&M activity. If the biologist determines that the activity would disrupt nesting, a buffer and limited operation period (LOP) during the nesting season (March 15–June 30) will be implemented. Evaluations will be performed in consultation with the local DFG representative.	SUB* PL* DL*						
AMM 21: If San Joaquin kit fox dens are present, their disturbance and destruction will be avoided where possible. However, if dens are located within the proposed work area and cannot be avoided during construction, qualified biologists will determine if the dens are occupied. If unoccupied, the qualified biologist will remove these dens by hand excavating them in accordance with USFWS procedures (U.S. Fish and Wildlife Service 1999). Exclusion zones will be implemented following USFWS procedures (U.S. Fish and Wildlife Service 1999) or the latest USFWS procedures. The radius of these zones will follow current standards or will be as follows: Potential Den—50 feet; Known Den—100 feet; Natal or Popping Den—to be determined on a case-by-case basis in coordination with USFWS and DFG. Pipes will be capped and exit ramps will also be installed in these areas to avoid direct mortality.	PL*	Within 50/100 feet from occupied kit fox dens	Conduct survey for kit fox dens. Implement USFWS procedures when removing kit fox dens and delineating exclusion zones. Consult with USFWS and CDFW regarding pupping dens.	Surveys completed by qualified biologist. Exclusion zones or dismantling practices used with USFWS and CDFW approval.	PG&E	SURV MON* REP*	<u>I. Prior to Construction:</u> <i>To be updated</i> <u>II. During Construction:</u> <i>To be updated</i>
					CPUC	REV MON* REP*	
AMM 22: All vegetation management activities will implement the nest protection program to avoid and minimize effects on Swainson's hawk, white-tailed kite, golden eagle, bald eagle, and other nesting birds. Additionally, trained pre-inspectors will use current data from DFG and CNDDDB and professional judgment to determine whether active Swainson's hawk, golden eagle, or bald eagle nests are located near proposed work. If pre-inspectors identify an active nest near a proposed work area, they will prescribe measures to avoid nest abandonment and other adverse effects to these species, including working the line another time of year, maintaining a 500-foot setback, or if the line is in need of emergency pruning, contacting the HCP Administrator.	PL*	Within approximately 500 feet of active nest locations	A qualified biologist shall conduct surveys and use CDFW and CNDDDB data to determine potential active nest locations in work areas. Avoid disturbance to active special-status raptors and other nesting birds during vegetation clearing.	Minimization methods used for nests during vegetation clearing.	PG&E	SURV DOC MON* REP*	<u>I. Prior to Construction:</u> <i>To be updated</i> <u>II. During Construction:</u> <i>To be updated</i>
					CPUC	REV MON* REP*	
AMM 29: No herbicide will be applied within 100 feet of exclusion zones, except when applied to cut stumps or frilled stems or injected into stems.	PL	100 feet from any exclusion zones	Do not use herbicides within 100 feet of exclusion zones.	Herbicides not used in close proximity to exclusion zones.	PG&E	MON	<u>II. During Construction:</u> <i>To be updated</i>
					CPUC	MON	
AMM 30: Trees being felled in the vicinity of an exclusion zone will be directionally felled away from the zone, where possible. If this is not feasible, the tree will be removed in sections.	PL	Adjacent to exclusion zones	Fell trees away from exclusion zones.	Exclusion zones protected during tree removal.	PG&E	MON	<u>II. During Construction:</u> <i>To be updated</i>
					CPUC	MON	

Mitigation Monitoring, Compliance, and Reporting Program

Table B-1: Mitigation Monitoring Program Table

Project EPMs (APMs, AMMs, and MMs)	Work Phase ^A	Location	Interpretation and Implementation Approach	Effectiveness Criterion	Responsible Parties	Required Actions ^B	Implementation Period and Status
MM Biology-1: PG&E shall conduct a pre-activity survey of those portions of the project that occur within native or naturalized areas (the project route from Perrin Avenue to Shepherd Avenue). The survey will be conducted following the <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities</i> (November 24, 2009). The width of the pre-activity survey will be 200 feet on the westerly side of the new power line and to the extent of PG&E's right-of-way on the easterly side. The survey will consist of walking parallel transects spaced approximately 50 feet apart to provide 100 percent visual coverage of the construction site and adjacent lands. The surveyors will map the location of all sensitive plants identified during the survey on drawings of the project site, noting the distance to construction areas, access roads, and laydown areas. If sensitive plant species are present, AMM-12, AMM-13, and AMM-14, shall be implemented.	PL	Within 200 feet on the westerly side of the new power line and to the extent of PG&E's right-of-way on the easterly side from Perrin Ave to E. Copper Ave.	Survey for special-status plants using the 2009 protocols in the described survey area. Map the locations of any sensitive plants identified during the survey and their proximity to construction work areas, including roads.	Surveys completed by qualified botanist. If present, see AMMs 12, 13, and 14.	PG&E	SURV DOC	<u>I. Prior to Construction:</u> <i>To be updated</i> <u>II. During Construction:</u> <i>To be updated</i>
					CPUC	REV	
MM Biology-2: A pre-activity survey for Molestan blister beetle shall be conducted by a qualified biologist within 30 days prior to the start of ground-disturbing construction activities. The width of the pre-activity survey will be to the extent of the power line easement and predetermined access routes that may fall outside of the easement area within suitable habitat (grasslands). If Molestan blister beetles are encountered, the biologist shall flag an exclusion zone of 25 feet around the potentially occupied habitat. If a smaller exclusion zone is required, the exclusion zone diameter will be determined by the project biologist based on field conditions and construction activities. The exclusion zone shall be subject to review by CPUC.	PL*	Grasslands in the project right-of-way	Conduct Molestan blister beetles survey in grassland within 30 days prior to ground disturbing activities. If present, establish 25-foot exclusion zones, as determined by the project biologist and approved by CPUC.	Survey for Molestan blister beetle conducted within 30 days prior to start of ground-disturbing construction activities in grassland areas by qualified biologist. Exclusion zones in place.	PG&E	SURV DOC* MON* REP*	<u>I. Prior to Construction:</u> <i>To be updated</i> Required within 30 days of construction <u>II. During Construction:</u> <i>To be updated</i>
					CPUC	REV MON* REP*	
MM Biology-3: Within 30 days of construction, a qualified biologist shall conduct a pre-activity survey within the suitable habitat for burrowing owl to determine this species' presence or absence. The width of the pre-activity survey will be 500 feet on the westerly side of the new power line, and to the extent of PG&E's right-of-way on the easterly side. The survey will consist of walking parallel transects spaced approximately 100 feet apart to provide 100 percent visual coverage of the construction site and adjacent lands. If western burrowing owls are present at the site, AMM-18 shall be implemented.	PL	Within 500 feet on the westerly side of the new power line, and to the extent of PG&E's right-of-way on the easterly side	Conduct burrowing owl surveys in survey area within 30 days of construction. If present implement AMM 18.	Survey by qualified biologist for burrowing owls conducted within 30 days of construction. If present, see AMM 18.	PG&E	SURV	<u>I. Prior to Construction:</u> <i>To be updated</i> Required within 30 days of construction <u>II. During Construction:</u> <i>To be updated</i>
					CPUC	REV	
MM Biology-4 (proposed to supersede APM Bio-23): If construction is to occur during the avian nesting season (February 1 through September 15), a preconstruction survey for migratory birds shall be conducted by a qualified wildlife biologist within 30 days prior to the start of ground-disturbing construction activities and prior to the start of construction in any new work area. The width of the pre-activity survey for raptor nests will be in vegetation within 500 feet on the westerly side of the new power line alignment and up to 500 feet on the easterly side of the alignment, where access is available. At a minimum, the survey will be to the extent of PG&E's right-of-way on the easterly side. For smaller avian species, the maximum width of the survey will be in vegetation 250 feet on the westerly side of the new power line alignment and up to 250 feet on the easterly side of the alignment where access is available. At a minimum, the survey will be to the extent of PG&E's right-of-way on the easterly side. The results of the survey shall be reported to the CPUC prior to construction. If active nests are found, appropriate buffers between construction activities and the nest will be established to ensure nests are not abandoned due to project activities. The State of California Department of Fish and Game (CDFG) recommended buffers are 250 feet for passerines and 500 feet for non-listed raptors. No additional measures will be implemented if active nests are outside of these distances from the nearest work site. The specified buffer size may be reduced on a case-by-case basis if, based on compelling biological or ecological reasoning (e.g. the biology of the bird species,	SUB PL DL	Vegetation within 500 feet on the westerly side of the new power line alignment and up to 500 feet on the easterly side of the alignment, where access is available.	Conduct avian nesting survey within 30 days prior to construction during the bird nesting season, and submit results to the CPUC prior to construction. If nests are present, establish nest exclusion buffers to restrict project activities from causing "take." If buffers are reduced below the CDFW-recommended distances (250 feet for passerines and 500 feet for raptors), the project biologist shall report the nest characteristics and justification. These reports shall be provided to CPUC on a regular basis, and to CDFW on a yearly basis.	Preconstruction nest survey completed by qualified biologist. Verify any nests observed during the Buffer exclusion zones used. Established exclusion zones adequate. Buffers expanded to CDFW-recommended distances if birds show signs of distress. Nest locations and buffer establishment reported during nesting season. Required reports provided. Required consultation with CDFW and/or USFWS performed.	PG&E	SURV DOC MON REP	<u>I. Prior to Construction:</u> <i>To be updated</i> Required within 30 days of construction <u>II. During Construction:</u> <i>To be updated</i>
					CPUC	REV MON REP	

Mitigation Monitoring, Compliance, and Reporting Program

Table B-1: Mitigation Monitoring Program Table

Project EPMs (APMs, AMMs, and MMs)	Work Phase ^A	Location	Interpretation and Implementation Approach	Effectiveness Criterion	Responsible Parties	Required Actions ^B	Implementation Period and Status
<p>concealment of the nest site by topography, land use type, vegetation, and level of project activity) and as determined by qualified wildlife biologist, that implementation of a specified smaller buffer distance will still avoid project-related "take" (as defined by Fish and Game Code Section 86) of adults, juveniles, chicks, or eggs associated with a particular nest. Any variance from CDFG-recommended buffers will be logged in a written report that includes the species, location, reason for the buffer reduction, the name and contact information of the qualified wildlife biologist(s) who authorized the buffer reduction and conducted subsequent monitoring, the reduced avoidance buffer size, duration of buffer reduction, and outcome to the nest, egg, young, and adults. The report should be submitted to CDFG at the end of each nesting season for the duration of the project. The nests will be monitored on a daily basis when construction activities are within the buffer zones. Monitoring will continue for the duration of the nesting season by a qualified wildlife biologist unless a qualified wildlife biologist has determined that the young have fledged, are no longer dependent upon parental care, or construction ends (whichever occurs first). If the nesting birds show signs of distress with a reduced buffer size during project activities, the qualified wildlife biologist will consult with the resource agencies (CDFG, U.S. Fish and Wildlife Service, etc.) and reinstate the recommended buffers.</p> <p>Buffers will not apply to construction-related traffic using existing roads that is not limited to project-specific use (i.e., county roads, highways, farm roads, etc.). Non-listed species found building nests within the standard buffer zone after specific project activities begin shall be assumed tolerant of that specific project activity and the nest will be protected by the maximum buffer practicable. However, these nests should be monitored on a daily basis by a qualified biologist when construction is within the buffer zone for the duration of the nesting season by a qualified wildlife biologist unless the qualified biologist has determined that the young have fledged, are no longer dependent upon parental care, or construction ends (whichever occurs first). Should nesting birds that have moved in during construction show signs of distress within a reduced buffer zone, and that stress is related to construction activities, the qualified wildlife biologist will reinstate the recommended buffers. The recommended buffers will only be reduced after the qualified biologist has determined that the nesting birds are no longer exhibiting signs of stress. Reporting regarding reduction of buffers will be documented in a written report and will follow the procedure described above.</p> <p>If the qualified wildlife biologist determines that there are listed or fully protected species nests within a 0.5-mile radius of project activities, PG&E will consult with the resource agencies to discuss how to implement the project and avoid "take," or if avoidance is not feasible, in the case of state-listed species, to acquire a state ITP prior to initiation or resumption (whichever applies) of any ground-disturbing activities.</p>			<p>Active nests within 250/500 feet from active work shall be monitored on a daily basis for signs of disturbance until the young have fledged. If nesting birds show signs of distress, CDFW-recommended exclusion buffers shall be reinstated, unless otherwise approved by CDFW and/or USFWS.</p> <p>If it is determined that there are active special-status avian nests within 0.5 mile of project activities, PG&E will consult with CDFW and/or USFWS.</p>				

Mitigation Monitoring, Compliance, and Reporting Program

Table B-1: Mitigation Monitoring Program Table

Project EPMs (APMs, AMMs, and MMs)	Work Phase ^A	Location	Interpretation and Implementation Approach	Effectiveness Criterion	Responsible Parties	Required Actions ^B	Implementation Period and Status
MM Biology-5: A preconstruction survey shall be conducted within 30 days of construction to determine the presence or absence of SJKF. This survey shall be conducted within suitable habitat and entail inspection of all burrows within 250 feet of the project site or to the extent of PG&E's right-of-way. If potential dens are detected, these dens shall be monitored using tracking medium and/or remote cameras for three nights to determine if SJKF inhabit them. If SJKF are found to be absent from the site the project can move forward with no further consideration of this species. If SJKF are found inhabiting the site or surrounding lands during the survey the measures identified in AMM 21 shall be implemented.	PL*	Within 250 feet of the project site or to the extent of PG&E's right-of-way	Conduct survey for SJKF dens in survey area within 30 days of construction. If potential dens are present, dens shall be monitored using tracking cameras for three nights to determine the dens' status. If dens are active, implement AMM 21.	Survey completed by qualified biologist. Status of den verified, if present. If active, see AMM 21.	PG&E	SURV DOC*	<u>I. Prior to Construction:</u> Required within 30 days of construction <i>To be updated</i> <u>II. During Construction:</u> <i>To be updated</i>
					CPUC	REV	
MM Biology-6: A survey for active dens of American badgers shall be performed by a qualified biologist within 30 days prior to construction grading or land clearing. Surveys shall be conducted within suitable habitat. The width of the pre-activity survey will be 250 feet on either side of the construction area or to the extent of PG&E's right-of-way. Construction may proceed once it is determined that there are no active dens in the survey area. If active dens are present, the dens shall be avoided during the breeding season and a 50-foot buffer around the den sites shall be established. Smaller buffers may be established through consultation with CDFG.	PL*	Within 250 feet of the project site or to the extent of PG&E's right-of-way	Conduct survey for American badger dens within 30 days of construction. If present, establish a 50-foot exclusion zone around dens, or consult with CDFW.	American badger survey conducted within 30 days of construction by qualified biologist. Appropriate buffers implemented, as needed.	PG&E	SURV MON REP	<u>I. Prior to Construction:</u> <i>To be updated</i> Required within 30 days of construction <u>II. During Construction:</u> <i>To be updated</i>
					CPUC	REV MON* REP*	
Cultural Resources							
APM Cult-2: If the applicant revises the location of proposed facilities and ground-disturbing activities that affect areas beyond those surveyed for the PEA, those areas will be subjected to a cultural resources inventory to ensure that any newly identified sites are avoided by ground-disturbing activities.	SUB* PL* DL*	Any new work areas not described in the IS/MND	Conduct additional cultural resource surveys in any new work areas that have not been previously surveyed.	Cultural resources inventory has been conducted for areas not surveyed for the PEA.	PG&E	SURV*	<u>I. Prior to Construction:</u> <i>To be updated</i>
					CPUC	REV*	
APM Cult-3: The applicant will minimize or avoid impacts to any potentially significant prehistoric and historic resources that might be discovered during construction by implementing standard protocols that include ceasing all work within 50 feet of the discovery, protecting the discovery from further impacts, and immediately contacting a PG&E Cultural Resources Specialist.	SUB PL DL	All work areas	Implement standard historic resource protection measures and stop work within 50 feet of a discovery.	Potential impacts to undiscovered cultural resources minimized.	PG&E	MON* REP*	<u>II. During Construction:</u> <i>To be updated</i>
					CPUC	MON* REP*	
APM Cult-4: If human remains are discovered, work in the immediate vicinity will stop immediately and a PG&E Cultural Resources Specialist will be contacted. The location of the discovery will be secured to prevent further impacts and the location will be kept confidential. The Cultural Resources Specialist will evaluate the discovery and will contact the Fresno County Coroner upon verifying that the remains are human. If the coroner determines the remains are Native American, the Native American Heritage Commission (NAHC) shall be contacted and the remains will be left in situ and protected until a decision is made on their final disposition.	SUB PL DL	All work areas	If human remains are found, stop work in the vicinity until the remains can be reported to the proper authorities.	Any discovered human remains reported to proper authorities.	PG&E	REP*	<u>II. During Construction:</u> <i>To be updated</i>
					CPUC	REP*	
MM Cultural-1 (proposed to supersede APMs Cult-1 and Pal-1): A qualified Cultural Resources Specialist shall design and implement a Cultural Resources Awareness Program that shall be provided to all project personnel who may encounter unique archaeological properties, historical resources, or paleontological resources, including construction supervisors and field personnel. No construction worker shall be involved in field operations without having participated in the Cultural Resources Awareness Program. The Cultural Resources Awareness Program shall include, at a minimum: <ul style="list-style-type: none"> A review of archaeology, history, prehistory, and Native American cultures associated with historical resources in California. A review of photographs and figures of potential historical resources and unique archaeological properties in California. 	SUB PL DL	N/A	Submit a Cultural Resources Awareness Program at least 30 days prior to construction. All workers must receive cultural resources training prior to working on site.	Content of Cultural Resources Awareness Program training materials verified. Construction workers' participation in Cultural Resources Awareness Program verified prior to field operation involvement.	PG&E	PPP DOC	<u>I. Prior to Construction:</u> <i>To be updated</i> Due at least 30 days prior to construction <u>II. During Construction:</u> <i>To be updated</i>
					CPUC	REV	

Mitigation Monitoring, Compliance, and Reporting Program

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Project EPMs (APMs, AMMs, and MMs)	Work Phase ^A	Location	Interpretation and Implementation Approach	Effectiveness Criterion	Responsible Parties	Required Actions ^B	Implementation Period and Status
<ul style="list-style-type: none"> A review of applicable local, state, and federal ordinances, laws, and regulations pertaining to cultural resource preservation. A discussion of procedures to be followed in the event that unanticipated paleontological or cultural resources are discovered during implementation of the project. A discussion of disciplinary and other actions that could be taken against persons violating historical preservation laws and PG&E policies. PG&E will require all contractors to comply with the Worker Environmental Awareness Program, PG&E policies, and other applicable laws and regulations as part of their contracts. Environmental training shall also be provided to workers regarding the protection of paleontological resources and procedures to be implemented in the event fossil remains are encountered during ground-disturbing activities. <p>The Cultural Resources Awareness Program may be conducted in concert with other environmental or safety awareness and education programs for the project. Cultural Resources Awareness Program training materials and/or presentations shall be submitted to CPUC for review and approval prior to the start of training sessions and at least 30 days prior to the start of construction.</p>							
<p>MM Cultural-2: Prior to construction, a certified paleontologist shall be retained by PG&E to supervise construction excavations and to produce a Paleontological Resource Management Plan (PRMP) for the proposed project. The PRMP shall be prepared and implemented under the direction of the paleontologist, and shall be submitted to CPUC for review and approval at least 30 days prior to construction. Construction activities that require excavation or augering of 5 feet in diameter or greater at depths greater than 5 feet shall be monitored on a part-time or full-time basis by a paleontological construction monitor only in those parts of the project area where these activities will disturb previously undisturbed strata in the Riverbank Formation rock unit. Should monitoring reveal paleontological resources of interest during visual inspection of the exposed rock unit, CPUC shall be immediately notified, and microscopic examination of matrix samples shall be conducted to determine if fossils are present.</p>	SUB PL	Excavations 5 feet in diameter or greater, or greater than 5 feet in depth	Retain a certified paleontologist to supervise excavations. Submit a PRMP at least 30 days prior to construction prepared by the certified paleontologist.	Content of PRMP verified. Paleontological resources monitoring performed in previously undisturbed strata of the Riverbank Formation rock unit.	PG&E	PPP MON REP	<p><u>I. Prior to Construction:</u> <i>To be updated</i> Due at least 30 days prior to construction</p> <p><u>II. During Construction:</u> <i>To be updated</i></p>
					CPUC	REV MON REP	
<p>MM Cultural-3 (proposed to supersede APM Pal-1): In the unlikely event that previously unidentified paleontological resources are uncovered during implementation of the project, CPUC shall be notified immediately and all ground-disturbing work shall be temporarily halted or diverted away from the discovery to another location. PG&E's paleontological resources specialist or his/her designated representative shall inspect the discovery and determine whether further investigation is required. If the discovery is significant, but can be avoided and no further impacts would occur, the resource shall be documented in the appropriate paleontological resource records and no further effort shall be required. If the resource is significant, but cannot be avoided and may be subject to further impact, PG&E shall evaluate the significance of the resources and implement data recovery excavation or other appropriate treatment measures, as approved by the landowner if on third-party property and as verified by CPUC.</p> <p>These measures may include a report prepared in accordance with PG&E, Society of Vertebrate Paleontology guidelines, and CPUC requirements, and/or curation at a recognized museum repository.</p>	SUB PL DL	All work areas	Halt work around discovery of any new paleontological resources and notify the CPUC immediately.	Impacts to paleontological resource discoveries limited and evaluated.	PG&E	MON	<p><u>II. During Construction:</u> <i>To be updated</i></p>
					CPUC	MON	

Mitigation Monitoring, Compliance, and Reporting Program

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Project EPMs (APMs, AMMs, and MMs)	Work Phase ^A	Location	Interpretation and Implementation Approach	Effectiveness Criterion	Responsible Parties	Required Actions ^B	Implementation Period and Status
Geology and Soils							
<p>APM Geo-1/WQ-1: Erosion and Sediment Control Plan (ESCP) implementation. An ESCP will be prepared in association with the Stormwater Pollution Prevention Plan (SWPPP). This plan will be prepared in accordance with the Water Board guidelines and other applicable Best Management Practices (BMPs). Implementation of the plan will help stabilize disturbed areas and waterways and will reduce erosion and sedimentation. The plan will designate BMPs that will be followed during construction activities. Natural-fiber biodegradable mesh will be used in erosion control mats, blankets, and straw or fiber wattles, where these products are required. Erosion-minimizing efforts may include, but are not limited to, measures such as:</p> <ol style="list-style-type: none"> Avoiding excessive disturbance of steep slopes. Using drainage control structures (e.g., straw wattles or silt fencing) to direct surface runoff away from disturbed areas. Strictly controlling vehicular traffic. Implementing a dust-control program during construction. Restricting access to sensitive areas. Using vehicle mats in wet areas. Revegetating disturbed areas, where applicable, following construction. In areas where soils are to be temporarily stockpiled, soils will be placed in a controlled area and will be managed with similar erosion control techniques. Where construction activities occur near a surface water body or drainage channel and drainage from these areas flows towards a water body or wetland, stockpiles will be placed at least 100 feet from the water body or will be properly contained (such as berming or covering to minimize risk of sediment transport to the drainage). Mulching or other suitable stabilization measures will be used to protect exposed areas during and after construction activities. Erosion-control measures will be installed, as necessary, before any clearing during the wet season and before the onset of winter rains. Temporary measures, such as silt fences or wattles intended to minimize erosion from temporarily disturbed areas, will remain in place until disturbed areas have stabilized. The SWPPP will be designed specifically for the hydrologic setting of the project. BMPs documented in the ESCP may also be included in the SWPPP. 	SUB PL DL	All work areas	<p>Prepare an ESCP in association with the SWPPP.</p> <p>Implement ESCP and SWPPP BMPs to control erosion and sedimentation.</p>	Erosion control and sedimentation BMPs implemented and maintained.	PG&E	PPP MON REP	<p><u>I. Prior to Construction:</u> <i>To be updated</i></p> <p><u>II. During Construction:</u> <i>To be updated</i></p> <p><u>III. Post-Construction:</u> <i>To be updated</i></p>
					CPUC	REV MON REP	
Hazards and Hazardous Materials							
<p>APM Haz-1: Emergency spill response and cleanup kits will be available on site and readily available for the cleanup of any accidental spill. Construction crews will be trained in safe handling and cleanup responsibilities prior to the initiation of construction.</p>	SUB PL DL	All work areas	Retain spill kits and provide worker training. Report any spill and cleanup methods employed.	Spills cleaned safely and adequately.	PG&E	DOC MON REP*	<p><u>II. During Construction:</u> <i>To be updated</i></p>
					CPUC	MON REP*	
<p>APM Haz-2: In the event of an accidental spill, the substation is equipped with a retention basin that meets SPCC Guidelines (40 CFR 112). The SPCC basin will be sufficiently sized to accommodate the accidental spill of all mineral oil from the largest transformer located at the substation. The substation will also be equipped with lead-acid batteries to provide backup power for monitoring, alarm, protective relaying, instrumentation and control, and emergency lighting during power outages. Containment will be constructed around and under the battery racks with neutralizing pads.</p>	SUB	Substation	Install Spill Prevention Control Countermeasure (SPCC) basin in substation to contain transformer mineral oil and battery acid.	SPCC basin installed with adequate volume for containment.	PG&E	DOC	<p><u>II. During Construction:</u> <i>To be updated</i></p>
					CPUC	REV	

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APM Haz-3: A water truck will be available on site during dry conditions, as assessed by the construction foreman, to prevent the ignition or spread of a wildfire. The work site will be sprayed a minimum of three times per day during dry conditions.	SUB	All work areas	Spray water during dry conditions to reduce fire hazard.	Water used to reduce fire hazards during dry conditions.	PG&E	MON REP	II. During Construction: <i>To be updated</i>
	PL				CPUC	MON REP	
MM Hazards-1: PG&E will submit a Site Safety Plan to the CPUC at least 30 days prior to project construction. The plan will identify ways to minimize the exposure of the public to potentially hazardous materials during all phases of project construction through operation and maintenance. The plan will require appropriate control methods and approved containment and spill-control practices for construction and materials stored on site. All hazardous materials and hazardous wastes will be handled, stored, and disposed of by personnel qualified to handle hazardous materials and in accordance with all applicable regulations. If it is necessary to store any chemicals on site, they will be managed in accordance with all applicable regulations. Materials Safety Data Sheets will be maintained and kept available on site, as applicable.	SUB	N/A	Submit a Site Safety Plan at least 30 days prior to construction. Store chemicals in accordance with applicable regulations.	Content and implementation of Site Safety Plan verified.	PG&E	PPP MON	I. Prior to Construction: <i>To be updated</i> Due at least 30 days prior to construction II. During Construction: <i>To be updated</i>
	PL				CPUC	REV MON	
MM Hazards-2: An Environmental Training and Monitoring Program (ETMP) shall be established to communicate any environmental concerns to all field personnel, in addition to appropriate work practices, including: <ul style="list-style-type: none">Spill prevention and response measures (including BMPs),Site-specific physical conditions to improve hazard prevention (e.g., identification of flow paths to nearest water bodies),Review of all site-specific plans, including, but not limited to, the project's SWPPP and Site Safety Plan. A copy of the ETMP shall be submitted to the CPUC at least 30 days prior to construction. Training records shall be kept on site and submitted to the CPUC upon request. A PG&E representative shall be designated to ensure that the plans are followed throughout the construction period. BMPs identified in the project SWPPP shall be implemented during project construction to minimize the risk of an accidental release of hazardous materials and to provide the necessary information for emergency response.	SUB	N/A	Note: PG&E has clarified that an Environmental Training Program (ETP) will be developed to address worker training, and a separate Environmental Compliance Management Plan (ECMP) will be developed to address monitoring requirements. Submit ETP and ECMP at least 30 days prior to construction. Verify workers are trained prior to working on the site.	Content and implementation of ETP and ECMP verified. ETP training provided to all workers prior to working on site.	PG&E	PPP DOC MON	I. Prior to Construction: <i>To be updated</i> Due at least 30 days prior to construction II. During Construction: <i>To be updated</i>
	PL				CPUC	REV MON	
MM Hazards-3: PG&E will coordinate with local emergency personnel in the event that project activities may impact an access point or route during an emergency. PG&E will notify local law enforcement and fire protection services before beginning construction activities that require road closures so that the project will not result in inadequate emergency access.	SUB	All work areas	Notify local law enforcement and fire protection services prior to conducting any work that may affect emergency access.	Emergency response personnel notified.	PG&E	DOC REP	I. Prior to Construction: <i>To be updated</i>
	PL				CPUC	REV	
MM Hazards-4: Smoking will not be permitted during fire season, except in a barren area that is paved or cleared to bare soil at least 10 feet in diameter, or within vehicles and enclosed equipment cabs. Under no circumstances will smoking be permitted during fire season while employees are operating light or heavy equipment, or while walking or working in grasslands.	SUB	All work areas	No smoking during the fire season, or in grasslands. Smoking shall be contained to designated areas.	Smoking occurs only in designated areas outside of the fire season.	PG&E	MON	II. During Construction: <i>To be updated</i>
	PL				CPUC	MON	
Hydrology and Water Quality							
APM WQ-2: PG&E will avoid working within seasonal wetlands, ponds, or other water bodies. No poles will be placed within seasonal wetlands. The limits of seasonal wetlands adjacent to the work areas will be flagged in the field for avoidance. Underground canal and creek crossings will be drilled or bored underneath the water body.	PL	All work areas	Determine if seasonal wetlands, ponds, or other water bodies are present in work areas. If present, flag and avoid water features.	Water features properly flagged for avoidance. Canal and creek crossings drilled or bored underneath the water body.	PG&E	DOC MON* REP*	I. Prior to Construction: <i>To be updated</i> II. During Construction: <i>To be updated</i>
	DL				CPUC	REV MON* REP*	

Mitigation Monitoring, Compliance, and Reporting Program

Table B-1: Mitigation Monitoring Program Table

Project EPMs (APMs, AMMs, and MMs)	Work Phase ^A	Location	Interpretation and Implementation Approach	Effectiveness Criterion	Responsible Parties	Required Actions ^B	Implementation Period and Status
APM WQ-3: PG&E will engineer a permanent infiltration basin within the substation perimeter to capture on-site stormwater, clean it of potential pollutants, and infiltrate it into the local groundwater table. Sizing and design of the facility will follow industry best practices, including Fresno County and California Stormwater General Permit guidelines.	SUB	Substation	Construct a stormwater infiltration basin within the substation.	Infiltration basin constructed.	PG&E	DOC MON	<u>II. During Construction:</u> <i>To be updated</i>
					CPUC	REV MON	
MM Hydrology-1: PG&E will be responsible for contacting property owners to help in identifying underground waterlines prior to construction. PG&E will design construction activities to avoid impacts to a known waterline to the extent that sufficient information is available to identify the precise location of the line. Should PG&E cause damage to an irrigation ditch or waterline during construction, PG&E will be responsible for contacting the owner to shut off the water supply, repairing the water line or irrigation ditch, and containing released water to the extent feasible.	PL DL	All work locations	Contact property owners to identify and avoid waterlines prior to construction. Repair any damage to waterlines caused by construction.	Impacts to known underground waterlines avoided. Construction-related damage repaired.	PG&E	DOC REP	<u>I. Prior to Construction:</u> <i>To be updated</i> <u>II. During Construction:</u> <i>To be updated</i>
					CPUC	REV REP	
MM Hydrology-2: In the case of a leak or other damage to the irrigation system utilized for the almond trees on the proposed substation site, PG&E will be responsible for repairing the irrigation system and employing BMPs as necessary to contain water released from the irrigation system.	SUB	Substation	Repair any damage to the almond orchard irrigation system and contain any water with erosion control BMPs.	Damage to almond orchard irrigation system repaired.	PG&E	MON REP	<u>II. During Construction:</u> <i>To be updated</i>
					CPUC	MON REP	
MM Hydrology-3: Workers will not conduct construction activities in flooded areas during area flooding except as necessary to help alleviate the flooding or address emergency safety issues at the project site. Should flooding of the proposed substation or project area result in damage to substation structures or power poles, non-emergency repairs to these structures and/or pole replacement as necessary would be conducted when floodwaters subside and the area is safe for worker access. PG&E will inform CPUC of any flood damage to the project site that could change or require changes to the proposed project or affect the construction schedule.	SUB PL DL	All work areas	Avoid working in flooded areas unless necessary. Notify CPUC if flood damage occurs on the project site.	Flooded areas avoided.	PG&E	MON REP	<u>II. During Construction:</u> <i>To be updated</i>
					CPUC	MON REP	
Land Use and Planning							
MM Land Use-1: PG&E will notify property owners within 300 feet of the project area at least 30 days prior to construction to alert them of project activities.	SUB PL DL	Within 300 feet of the project area	Notify landowners at least 30 days prior to construction of project activities.	Property owners notified.	PG&E	DOC	<u>I. Prior to Construction:</u> <i>To be updated</i> Due at least 30 days prior to construction
					CPUC	REV	
Noise							
APM Noise-1: Construction will not occur before 6:00 a.m. or after 9:00 p.m. on any day except Saturday or Sunday, when construction will not occur before 7:00 a.m. or after 5:00 p.m. Work will only be conducted outside of these hours as required for project safety or to take advantage of the limited times when the power line can be taken out of service.	SUB PL DL	All work areas	Conduct construction between the hours of 6 a.m. and 9 p.m., Mondays through Fridays, and between 7 a.m. and 5 p.m. on Saturdays and Sundays. If it is necessary to conduct work outside of these periods, PG&E shall provide justification in writing and the time periods of work.	Noise disturbance limited by conducting work during described periods.	PG&E	DOC MON REP	<u>II. During Construction:</u> <i>To be updated</i>
					CPUC	REV	

Mitigation Monitoring, Compliance, and Reporting Program

Table B-1: Mitigation Monitoring Program Table

Project EPMs (APMs, AMMs, and MMs)	Work Phase ^A	Location	Interpretation and Implementation Approach	Effectiveness Criterion	Responsible Parties	Required Actions ^B	Implementation Period and Status
APM Noise-3: Where feasible, construction traffic will be routed to avoid sensitive noise receptors such as residences, schools, religious facilities, hospitals, and parks.	SUB	Project access roads and delivery routes	Route construction traffic away from sensitive receptors.	Noise disturbance reduced to sensitive receptors.	PG&E	DOC MON	II. During Construction: <i>To be updated</i>
	DL				CPUC	REV	
APM Noise-4: Stationary equipment used during construction will be located as far as practical from sensitive noise receptors.	SUB	All work areas	Place stationary equipment away from sensitive receptors.	Noise disturbance reduced to sensitive receptors.	PG&E	MON REP	II. During Construction: <i>To be updated</i>
	DL				CPUC	MON REP	
APM Noise-6: Where feasible, equipment will be used that is specifically designed for low noise emissions and equipment powered by electric or natural gas as opposed to diesel or gasoline.	SUB	All work areas	Use low noise-emitting equipment.	Noise disturbance reduced to sensitive receptors.	PG&E	DOC MON	II. During Construction: <i>To be updated</i>
	DL				CPUC	REV	
APM Noise-7: Residents in areas of heavy construction noise will be notified prior to commencing construction activities. Notification should include written notice and the posting of signs in appropriate locations with a contact number that residents can call with questions and concerns.	SUB*	Substation and project power and distribution lines	Notify residents (also see MM Land Use-1) and install signs with a contact phone number along Sunnyside Avenue at the boundary of the substation property.	Adjacent residents notified regarding construction noise. Notice signs installed along Sunnyside Avenue at the boundary of the substation property.	PG&E	DOC MON* REP*	I. Prior to Construction: <i>To be updated</i>
	DL*				CPUC	REV MON* REP*	
Traffic and Transportation							
APM Tran-1: Deliveries will be made during normal construction hours.	SUB	All work areas	Schedule deliveries to the site during normal construction hours (also see APM Noise-1).	Deliveries comply with the scheduled construction hours.	PG&E	MON	II. During Construction: <i>To be updated</i>
	DL				CPUC	MON	
APM Tran-2: PG&E shall prepare and implement a Traffic Management Plan or plans as required by, and in accordance with County requirements. The plan or plans shall be submitted to the CPUC when submitted to the County, and shall be distributed to all construction supervisors prior to commencement of construction activities.	SUB	Project access roads and delivery routes	Submit and implement a Traffic Management Plan to Fresno County and the CPUC when working in a County road.	Traffic Management Plan prepared, submitted to Fresno County, and implemented.	PG&E	PPP MON REP	I. Prior to Construction: <i>To be updated</i> II. During Construction: <i>To be updated</i>
	DL				CPUC	REV MON REP	

NOTES:
^A As described in Section 5 of the MMCRP, SUB = Substation construction; PL = Power line construction; and, DL = Distribution line construction
^B As described in Section 5 of the MMCRP, PPP = Submit a plan, program, or permit; SURV = Submit survey results; DOC = Submit written documentation verifying EPM implementation (memorandum, letter, or email correspondence); REV = Review and verify submitted plan, program, permit, or other written documentation; MON = Monitor or visual verify on site; REP = Verify through reporting in the PG&E Compliance Reports and CPUC Monitoring Reports
* Specifies a required action during a work phase that depends on circumstances (e.g., only if a species is identified during surveys, if a water feature is identified in a work area, if a work activity poses a potential risk to a resource, etc.)

Appendix C: Project Personnel and Contact List

Mitigation Monitoring, Compliance, and Reporting Program

Table C-1: Project Personnel and Contacts List			
Title	Name	Organization	Contact Information
PG&E Compliance Team			
PG&E Project Manager	Chris Howard	PG&E	Email:C1HS@pge.com Phone:
PG&E Environmental Compliance Lead	Greg Parker (Primary)	PG&E	Email:GAP1@pge.com Phone:
	Tom Johnson (Backup)	PG&E	Email:TJJ1@pge.com Phone:
PG&E Environmental Compliance Supervisor	Brook Langle	Terra Verde	Email: Phone:
PG&E Environmental Inspector (EI)	Rosalyn Kenney (Lead EI)	Terra Verde	Email: Phone:
<i>PG&E Specialty Monitors</i>			
SWPPP Inspector			Email: Phone:
BMP Installation and Maintenance Inspector			Email: Phone:
Designated Biologist			Email: Phone:
Cultural Monitor			Email: Phone:
Paleontological Monitor			Email: Phone:
PG&E Construction Management			
PG&E Construction Manager (Substation Grading and Foundation)		PG&E	Email: Phone:
PG&E Construction Manager (Transmission Line Segment)		PG&E	Email: Phone:
PG&E Construction Manager (Steel Towers)		PG&E	Email: Phone:
PG&E Construction Lead		PG&E	Email: Phone:

Mitigation Monitoring, Compliance, and Reporting Program

Table C-1: Project Personnel and Contacts List			
Title	Name	Organization	Contact Information
CPUC Monitoring Team			
CPUC Legal Counsel	Jack Mulligan	CPUC	Email: Phone:
CPUC Project Manager	Michael Rosauer	CPUC	Email: michael.rosauer@cpuc.ca.gov Phone: (415)
CPUC Monitoring Director	Susanne Heim	Panorama	Email: susanne.heim@panoramaenv.com Phone: (650) 340-4803
CPUC Monitoring Manager	Aaron Lui	Panorama	Email: aaron.lui@panoramaenv.com Office: (650) 340-4836 Mobile: (916) 719-0094
CPUC Environmental Monitor (EM)	Rita Wilke	Panorama	Email: rita.wilke@panoramaenv.com Office: (650) 373-1200 Mobile: (530) 647-6043
	Bryan Mori (Biologist)	Panorama	Email: bryan.mori@panoramaenv.com Office: (831) 728-1043 Mobile: (831) 539-3507

Appendix D: Communication Protocol Tables

COMMUNICATION PROTOCOL TABLES

Section 3 of the MMCRP includes a summary of communication policies and protocols. The following tables describe project personnel contact groups and communication protocols. Contact information for is provided in Appendix C. An organization chart is located in the MMCRP (Figure 2.3-1).

Table D-1: Designated Communication Groups		
Contact Level (Primary and Secondary)	Compliance Team Personnel	Personnel Names
Group 1: Field Personnel		
<i>Primary</i>	PG&E EI	Rosalyn Kenney
	CPUC Monitoring Manager	Aaron Lui
	CPUC EM	Rita Wilke and Bryan Mori
<i>Secondary (as needed)</i>	PG&E Environmental Compliance Lead	Greg Parker
	PG&E Environmental Compliance Supervisor	Brook Langle
	PG&E Construction Manager	
	PG&E Construction Leads	
	PG&E Specialty Monitors	
Group 2: Compliance Oversight		
<i>Primary</i>	PG&E Environmental Compliance Lead	Greg Parker
	PG&E Environmental Compliance Supervisor	Brook Langle
	PG&E EI	Rosalyn Kenney
	CPUC Monitoring Director	Susanne Heim
	CPUC Monitoring Manager	Aaron Lui
	CPUC EM	Rita Wilke and Bryan Mori
<i>Secondary (as needed)</i>	PG&E Project Manager	Chris Howard
	CPUC Project Manager	Michael Rosauer
Group 3: Project Management		
<i>Primary</i>	CPUC Project Manager	Michael Rosauer
<i>Secondary (as needed)</i>	PG&E Project Manager	Patricia Healy
	CPUC Legal Counsel	Jack Mulligan

Mitigation Monitoring, Compliance, and Reporting Program

Table D-2: Communication Protocols		
Type of Communication	Personnel Groups from Table D-1	Responsible Party and Description of Communication
Meetings		
Site visits	Group 1	CPUC: The CPUC EM shall contact the PG&E EI or another PG&E representative prior to making a site visit to verify safe access to the site.
Regular construction meetings	Group 1	PG&E and CPUC: Regular construction meetings or morning tailgate meetings shall be held in the field to discuss construction progress, EPM requirements, and project status. The CPUC EM will attend construction meetings on an as needed basis when visiting the site, or if requested by the PG&E EI.
Teleconference calls	Groups 1 and 2	PG&E and CPUC: Regular teleconference calls may be held to discuss noncompliance issues or other aspects of the project, as needed.
In-person meetings	Groups 1, 2, and 3	PG&E and CPUC: Office or field meetings may be requested by any party to discuss project status, as needed.
Notice to Proceed Procedure		
Notice to Proceed (NTP) procedure	Groups 2 and 3	<ol style="list-style-type: none"> PG&E: The PG&E Compliance Team shall submit an NTP request to the CPUC Monitoring Team using the NTP Request Form located in Appendix E; along with an updated version of Table B-1 verifying completion of EPM requirements for the applicable work phase (see Section 5). <i>Note: Minor Project Modification requests may be submitted with an NTP request for simultaneous review. See Section 4.6 of the MMCRP or below under project changes).</i> CPUC: The CPUC Monitoring Team shall review the NTP request to verify compliance with the IS/MND, EPMs, and MMCRP, and provide PG&E with a list of any additional information or outstanding requirements, if needed. PG&E: The PG&E Compliance Team shall provide any additional information or outstanding requirements to supplement the NTP request, which shall be added to the NTP review material. CPUC: The CPUC Monitoring Team shall confirm that preconstruction EPM requirements have been met, and ongoing EPM requirements will be implemented. Any outstanding EPM requirements may be made conditions of approval, as determined by the CPUC Project Manager. CPUC: Once EPM requirements have been verified, the CPUC Monitoring Team shall prepare a draft NTP approval letter for the CPUC Project Manager. The letter shall document PG&E's proposed scope of work, verify compliance with the IS/MND and EPMs, provide analysis of any proposed Minor Project Modifications, and describe any conditions of approval. CPUC: The CPUC Compliance Team shall provide the CPUC Project Manager with the draft letter and provide additional assistance, as needed.

Mitigation Monitoring, Compliance, and Reporting Program

Table D-2: Communication Protocols		
Type of Communication	Personnel Groups from Table D-1	Responsible Party and Description of Communication
		<ol style="list-style-type: none"> CPUC: The CPUC Project Manager shall review the draft letter and make a decision to approve or deny the NTP request and issue the final letter to PG&E. PG&E: The PG&E Compliance Team is then responsible for completing conditions of approval, if any, and submitting any specified documentation.
Observations or Questions Requiring Follow-up (described in Section 3.3)		
Observations or questions requiring follow-up	Groups 1 or 2	<ol style="list-style-type: none"> PG&E and CPUC: Observations made in the field or questions raised through document review may require further research and follow-up. Both parties shall determine an agreed-upon follow-up timeframe to respond to questions or concerns. CPUC: The CPUC Monitoring Team shall track and document follow-up items in the CPUC Monitoring Reports.
Compliance Levels (described in Section 4.5 and Appendix F)		
Level 0: "Acceptable"	Group 1	PG&E and CPUC: Observations of compliance with EPMs during construction shall be documented as Acceptable in daily site inspection reports by both the PG&E Compliance Team and CPUC Monitoring Team.
Level 1: "Occurrences"	Group 1	<ol style="list-style-type: none"> PG&E and CPUC: Occurrences reported during site inspections shall be documented by the reporting party. CPUC: The CPUC EM shall notify the PG&E EI at a minimum if an Occurrence is documented during a CPUC site inspection. The EM will document the event in the CPUC Daily Inspection Report and the Monitoring Summary Report for the period. PG&E: If the PG&E EI documents an Occurrence, immediate notification to the CPUC is not required. The Occurrence event shall be reported in the PG&E Daily Inspection Report and the Compliance Summary Report for the period. CPUC may request increased notification, if necessary. <p>PG&E and CPUC: Both parties shall continue to follow-up with reporting and communication until all issues are resolved.</p>

Mitigation Monitoring, Compliance, and Reporting Program

Table D-2: Communication Protocols		
Type of Communication	Personnel Groups from Table D-1	Responsible Party and Description of Communication
<p>Level 2: "Minor Problem"</p>	Groups 1 or 2	<ol style="list-style-type: none"> PG&E and CPUC: Minor Problems and Compliance Issues with project EPMs may be determined by either PG&E or CPUC in the field, through review of project reports, or during communication. The reporting party shall issue a Notification of Incident (example form located in Appendix G) no later than the following business day that includes all information described in the Notification of Incident form, included in Appendix G. PG&E: The PG&E Compliance Team shall respond to CPUC notices and provide follow-up actions taken, as needed. PG&E and CPUC: Both parties shall continue to follow-up with reporting and communication until all issues are resolved.
<p>Level 3: "Compliance Issue"</p>		
<p>Level 4: "Noncompliance"</p>	Groups 1, 2, and 3	<ol style="list-style-type: none"> PG&E and CPUC: Noncompliance with project EPMs may be determined by either PG&E or CPUC in the field, through review of project reports, and through communication. PG&E and CPUC: If a Noncompliance is observed in the field, the CPUC EM or PG&E EI shall immediately notify the PG&E Construction Manager or Construction Lead to halt construction activities, when safe to do so, and implement any emergency actions to stop the Noncompliance. PG&E and CPUC: The reporting party will issue a Notification of Incident (example form located in Appendix G) within one business day of the determination and follow up with a Noncompliance Memorandum as needed to describe and resolve the issue. CPUC: The CPUC Project Manager shall issue a Noncompliance memorandum to the PG&E Compliance Team if it is determined that project activities are not in compliance with EPM requirements and an environmental resource has been damaged or put at unpermitted risk. PG&E: The PG&E Compliance Team shall provide follow-up actions to the CPUC detailing steps to bring the project back into compliance and a specific timeline. PG&E and CPUC: Both parties shall continue to follow-up with reporting and communication until all issues are resolved.
Project Changes (described in Section 4.6)		
Construction schedule changes	Groups 1, 2, and 3	PG&E: Changes in project schedule that could affect the status of mitigation measures shall be communicated to the CPUC Monitoring Team.

Mitigation Monitoring, Compliance, and Reporting Program

Table D-2: Communication Protocols		
Type of Communication	Personnel Groups from Table D-1	Responsible Party and Description of Communication
Minor Field Change (MFC); and, Temporary Extra Work Space (TEWS)	Group 1	<ol style="list-style-type: none"> PG&E: Requests for a MFC or TEWS shall be submitted to the CPUC EM using the form located in Appendix H. CPUC: The EM will review the MFC request and issue approvals, as determined, once the request information can be verified. CPUC: The CPUC Monitoring Team will track all MFC and TEWS requests in Monitoring Summary Reports.
Minor Project Modification (MPM)	Groups 1, 2, and 3	<ol style="list-style-type: none"> PG&E: All MPM requests shall be submitted to the CPUC Monitoring Team using the form located in Appendix H. CPUC: The CPUC Monitoring Team shall review the MPM request for completeness, analyze the proposed work, verify that applicable EPMs have been addressed and no EPMs will be violated, and request any additional information from the PG&E Compliance Team, as needed. PG&E: The PG&E Compliance Team shall provide additional supporting information, as needed. CPUC: The CPUC Monitoring Team will determine if the proposed project change is consistent with the IS/MND or if additional CEQA review is required through consultation with the CPUC Project Manager. If no additional CEQA review is required, the CPUC Monitoring Team shall prepare a draft concurrence letter. If additional CEQA review is required for the change, a draft denial letter will be prepared. CPUC: The CPUC Project Manager shall review and distribute the response letter to concur with or deny the MPM. PG&E: The PG&E Compliance Team is then responsible for submitting any specified documentation.
Other Communication		
Agency consultation and notification	Groups 2 and 3	<ol style="list-style-type: none"> CPUC and PG&E: Jurisdictional resource agencies may be notified of an incident or noncompliance event, if jurisdictional resources were involved. CPUC and PG&E: Resource agencies may be contacted for guidance in interpreting an EPM requirements or permit condition. PG&E: The CPUC Monitoring Team shall be provided with adequate documentation of all agency notifications and consultations necessary to verify compliance and/or approvals, should they be required. CPUC: The CPUC may elect to contact jurisdictional agencies to verify approvals or adequate implementation of an EPM requirement or permit conditions.

Mitigation Monitoring, Compliance, and Reporting Program

Table D-2: Communication Protocols		
Type of Communication	Personnel Groups from Table D-1	Responsible Party and Description of Communication
Dispute resolution	Groups 2 and 3	CPUC and PG&E: Refer to Section 3.7 for dispute resolution protocol in the event that a dispute cannot be resolved by field personnel.
Reporting	Groups 1, 2, and 3	Refer to Section 4.3 for a description of reporting requirements for the project. Standard reporting for the project includes: PG&E: <ul style="list-style-type: none"> • Daily Inspection Reports • Compliance Summary Reports • Final Compliance Report CPUC: <ul style="list-style-type: none"> • Site Inspection Reports • Mitigation Monitoring Reports • Final Monitoring Report
Environmental Training Program (ETP) logs/attendance sheets	Groups 1 or 2	PG&E: The PG&E Compliance Team will submit ETP training logs/attendance sheets to the CPUC Monitoring Team on a regular basis (typically monthly).

Appendix E: Notice to Proceed Request Form



SHEPHERD SUBSTATION PROJECT

Notice to Proceed (NTP) Request Form

NTP Request #:

Part A: NTP Request Summary		
Date Submitted:	Requested Approval Date:	Expected Start Date:
Click here to enter a date.	Click here to enter a date.	Click here to enter a date.
Submitted by:	Organization and Title:	Expected End Date:
Click here to enter text.	Click here to enter text.	Click here to enter a date.
Requested NTP Action(s): <i>(List and describe each requested action or project phase, as described in the Initial Study/Mitigated Negative Declaration [IS/MND] or previously approved Minor Project Modifications [MPMs]. Include the location and anticipated schedule for each action. Attach additional information, as necessary.)</i>		

Click here to enter text.

Part B: Minor Project Modification		
Does the NTP require a Minor Project Modification (MPM)? <i>(If so, briefly list each proposed change below and attach a complete MPM Request Form.)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Click here to enter text.

Part C: Pre-construction Compliance		
Attach an updated version of the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) Table (Appendix B). Update the Implementation Status to reflect this NTP Request. <i>(Required)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

SHEPHERD SUBSTATION PROJECT

Notice to Proceed (NTP) Request Form



Part D: Surveys		
Biological Resources. Were all sites associated with the requested action(s) surveyed for biological resources? If so, were survey results positive or negative? Were surveys completed during the appropriate timing and season to detect resources? <i>(If not, describe below and note in the attached MMCRP Program Table)</i>	<input type="checkbox"/> Previously Surveyed	<input type="checkbox"/> Positive
	<input type="checkbox"/> Survey Attached	<input type="checkbox"/> Negative
	<input type="checkbox"/> N/A	
Cultural Resources. Were all sites associated with the requested action(s) surveyed for cultural resources (records search and pedestrian survey)? If so, were survey results positive or negative?	<input type="checkbox"/> Previously Surveyed	<input type="checkbox"/> Positive
	<input type="checkbox"/> Survey Attached	<input type="checkbox"/> Negative
	<input type="checkbox"/> N/A	
Hydrology. Were all sites associated with the requested action(s) surveyed for wetlands and other water resources? If so, were survey results positive or negative?	<input type="checkbox"/> Previously Surveyed	<input type="checkbox"/> Positive
	<input type="checkbox"/> Survey Attached	<input type="checkbox"/> Negative
	<input type="checkbox"/> N/A	
Surveys: <i>(List each survey conducted for the NTP request, provide a brief summary of the dates and results below, and include key details of each survey in the attached MMCRP Program Table)</i>		

[Click here to enter text.](#)

Part E: Permits and Agency Approvals	
Have all required permits, permit amendments/reauthorizations, or agency approvals) been issued by resource agencies with applicable jurisdiction?	<input type="checkbox"/> Previously Provided
	<input type="checkbox"/> Authorization Attached
	<input type="checkbox"/> N/A
Permits and Agency Approvals: <i>(List each permit or approval that applies to the NTP request, provide a brief summary of each as necessary, and include key details in the attached MMCRP Program Table)</i>	

[Click here to enter text.](#)

SHEPHERD SUBSTATION PROJECT

Notice to Proceed (NTP) Request Form



Part F: Other Preconstruction Requirements	
<p>Were all other necessary preconstruction requirements (e.g., plans, programs, etc.) completed for the requested action(s)? <i>(If not, describe when they will be completed prior to the requested action(s) and note in the MMCRP Program Table)</i></p>	<input type="checkbox"/> Previously Approved <input type="checkbox"/> Documentation Attached <input type="checkbox"/> N/A
<p>Other Preconstruction Requirements: <i>(List other preconstruction requirements that were completed for the NTP, provide a brief summary of each as necessary, and include key details in the attached MMCRP Program Table)</i></p>	

[Click here to enter text.](#)

Appendix F - Compliance Levels and Reporting Terms

Table F-1: Summary of Compliance Levels and Reporting Terms

Compliance Levels and Reporting Terms in Order of Severity (Described in Section 4.5)

Level 0: Compliant

Reporting Term: "Acceptable"

Definition: An event, or observation of activities or a work site, that was compliant with project EPMs and permit conditions.

Discussion: The term "Acceptable" will be assigned by the EI or EM when observations are made during field inspections that meet project EPM requirements and permit conditions.

Use Examples:

- An inactive work site was inspected and all best management practices were in place and intact as required.
- Dewatering of an excavation was conducted in accordance with project EPMs.
- Topsoil was stripped to the appropriate depth.
- A sensitive resource exclusion zone was appropriately avoided and exclusion fencing was intact.
- Erosion controls were installed at a work site adequately, or are functioning properly, as specified in the SWPPP.

Reporting: Document in Daily or Site Inspection Reports described in Section 4.3. Additional communication protocol is described in Appendix D.

Level 1: At risk of being out of compliance (low severity)

Reporting Term: "Occurrence"

Definition: An event, or observation of activities or a work site, that needs to be highlighted and addressed before it deviates from project EPMs or permit conditions.

Discussion: The term "Occurrence" will be assigned by the EI or EM when it has been determined that project activities could affect compliance with project EPMs or permit conditions if left unaddressed. Documentation of an "Occurrence" expresses concern with compliance, but does not necessarily reflect poorly on the project's compliance record. Documentation of "Occurrences" may require additional follow-up actions.

Use Examples:

- Discovery on an unanticipated cultural resource.
- An inadvertent return (i.e., frac-out) event that occurred during drilling without putting a resource at risk.
- 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.

Reporting: Document in all levels of reporting described in Section 4.3. Additional communication protocol is described in Appendix D.

Level 2: Out of compliance (low to moderate severity)

Reporting Term: "Minor Problem"

Definition: An event, or observation of activities or a work site, that slightly deviates from project EPMs or permit conditions, but does not put a sensitive resource at unpermitted risk.

Discussion: The term "Minor Problem" will be assigned by the EI or EM when it has been determined that project EPMs or permit conditions were violated, but are quickly corrected without putting a sensitive resource at unpermitted risk. Documentation of a "Minor Problem" typically requires additional follow-up actions. Repeated "Occurrences" involving the same issue may be elevated to a "Minor Problem."

Use Examples:

- 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.
- Erosion controls were improperly installed or maintained at a work site, but did not result in discharge of sediment.

Mitigation Monitoring, Compliance, and Reporting Program

- 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.

Reporting: Submit a Notification of Incident (example form located in Appendix G) within one business day of the determination and document in all levels of reporting described in Section 4.3. Additional communication protocol is described in Appendix D.

Level 3: Out of compliance (moderate to high severity)

Reporting Term: "Compliance Issue"

Definition: An event, or observation of activities or a work site, that slightly deviates from project EPMs or permit conditions and put a sensitive resource at minor unpermitted risk, but is quickly corrected without impacting the resource.

Discussion: The term "Compliance Issue" will be assigned by the EIR or EM when it has been determined that project EPMs or permit conditions were violated and a sensitive resource was put at unpermitted risk, but are quickly corrected without impacting the resource. Documentation of a "Compliance Issue" typically requires additional follow-up actions. Repeated "Minor Problems" involving the same issue may be elevated to a "Compliance Issue."

Use Examples:

- 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 100 feet 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.

Reporting: Submit a Notification of Incident (example form located in Appendix G) within one business day of the determination and document in all levels of reporting described in Section 4.3. Additional communication protocol is described in Appendix D.

Level 4: Out of compliance (high severity)

Reporting Term: "Noncompliance"

Definition: An event, or observation of activities or a work site, that violates project EPMs, permit conditions, or MMCRP authorization requirements (e.g., NTP or minor project change approval), and result in unpermitted risk or impacts to a sensitive resource.

Discussion: The term "Noncompliance" will be assigned to an observation by the PG&E Compliance Team or CPUC Monitoring Team when it has been determined that project EPMs, permit conditions, or MMCRP authorization requirements have been violated, and as a result a sensitive resource was put at unpermitted risk or impacted. Documentation of a "Noncompliance" requires additional follow-up actions. Repeated "Minor Problems" or "Compliance Issues" involving the same issue may be elevated to a "Noncompliance Issue."

Examples:

- 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.

Reporting: Submit a Notification of Incident (example form located in Appendix G) within one business day of the determination and follow up with a Noncompliance Memorandum as needed to describe and resolve the issue. Document the incident in all levels of reporting described in Section 4.3. Additional communication protocol is described in Appendix D.

Appendix F: Compliance Level Definitions and Scenarios

COMPLIANCE LEVEL DEFINITIONS

Acceptable

Site-specific observations that achieve compliance with a project's environmental requirements are documented by the Environmental Inspector in the Environmental Inspection Report as "acceptable." For example, if the Environmental Inspector observes dewatering of an excavation and all work is done in accordance with project environmental requirements, then the observation would be documented as "acceptable." The following are some examples of reports that would be considered "acceptable":

- Available topsoil is being stripped to the appropriate depth.
- Exclusion zone fencing is intact around the sensitive resource adjacent to the contractor yard. All activity is keeping out of the exclusion zone.
- Silt fence is installed correctly on the west side of the site as specified in the SWPPP.

Occurrence

An "occurrence" is an activity or occurrence that needs to be highlighted and addressed, but that doesn't necessarily reflect the project's compliance record (i.e., acceptable, minor problem, compliance issue, or noncompliance). Some examples include:

- an unanticipated cultural resource discovery;
- an inadvertent return (i.e., frac-out) that occurs during a horizontal directional drill; or
- a hydraulic hose breaks and the contractor immediately contains and cleans up the spill according to project requirements.

An occurrence can impact resources, such as a frac-out in a river. In these cases, the Environmental Inspector will immediately notify the PG&E Environmental Compliance Lead, who will be responsible for ensuring that any required agency notifications are made by appropriate PG&E staff as specified in Appendix A. If an occurrence results in impacts to resources, the Environmental Inspector may also need to provide additional documentation of specific resource impacts to the PG&E Environmental Compliance Lead, as well as an assessment of which permit requirements are applicable to the occurrence. However, in most cases, an entry in the Environmental Inspector's Environmental Inspection Report is sufficient to document an occurrence.

Minor Problem

A "minor problem" is a slight deviation from the environmental requirements with little or no impact to sensitive resources. Some examples include:

- failing to remove trash from the work area;
- improperly installing erosion control devices; and
- neglecting to maintain erosion control devices.

Project personnel should address minor problems immediately, if possible. Although minor problems tend to have little or no impact on resources, prompt corrective action will minimize the potential for the problem to escalate. Minor problems and their correction will be documented by the Environmental Inspector using the Environmental Inspection Report and no additional documentation or notification is required. If the contractor fails to address a minor problem in a timely manner, or conditions worsen due to a lack of response, the Environmental Inspector may elevate the compliance level to a compliance issue or noncompliance.

Compliance Issue

A compliance issue is a situation in the field that needs to be addressed immediately to prevent resource damage or environmental noncompliance. In addition, a compliance issue may be identified by the Environmental Inspector if there are repeated minor problems that, as a group, show a trend toward placing resources at unnecessary risk. Compliance issues are typically addressed immediately or before the end of the workday. Some examples include:

- placing soil or construction material outside of the approved work area in a non-sensitive area and removing it by the end of the day;
- storing fuels closer than 100 feet from a waterbody or wetland without providing secondary containment; or
- using an unapproved access road in a way that does not damage the road or resources.

Compliance issues that are resolved by the end of the day will be documented by the Environmental Inspector using the Environmental Inspection Report and no additional documentation or notification is required.

Noncompliance

“Noncompliance” is assigned to an activity that violates the environmental requirements and results in an impact to resources or places environmental resources at risk. Some examples include:

- placing soil or construction material outside of the approved work area in an environmentally sensitive area;
- dewatering the trench near a sensitive resource without installing appropriate erosion and sediment control devices;
- cutting down a tree with a known raptor nest;
- driving “cross-country” through a delineated sensitive resource area; and
- continuing to operate equipment after being requested to halt temporarily by the Environmental Inspector or PG&E Construction Inspector.

Noncompliances will be documented with a Noncompliance Notice and Noncompliance Resolution Report once corrective action is complete. Noncompliances and their resolution will also be addressed in the Compliance Summary Report. See the instructions for each of these forms for more details.

Compliance Level Scenarios

Scenario	Acceptable	Occurrence	Minor Problem	Compliance Issue	Noncompliance
1. The contractor parked a backhoe on the right-of-way overnight. During the night the equipment leaked a large spot of oil on the ground. When the contractor discovered the leak in the morning, the crew cleaned up the spill properly and had a mechanic fix the equipment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. A hydraulic hose breaks on a backhoe and releases hydraulic fluid in a stream. The contractor cleans up the spill with absorbent pads and booms from the on-site spill kit and bags up the contaminated soil for disposal.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Same scenario as #2, but the contractor does not have spill response equipment on the site and someone has to drive 15 miles back to the yard to get some.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. The Contractor is has just begun work on a wetland crossing and does not have spill response equipment onsite. You tell the on-site Construction Inspector it needs to be there and the contractor corrects the problem before the end of the day.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. You are meeting with the Chief Inspector and the contractor in the field to talk through a dewatering operation that is scheduled for the following day. You remind the contractor to have extra hose on hand to deal with unexpected contingencies.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. The contractor requests extra workspace for spoil storage at a wetland crossing. The request is submitted to the CEQA lead agency, but the contractor begins using the area before the variance is approved.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. The contractor begins excavation in a signed "Monitor Required" area without a paleontological resources monitor present.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. The Contractor begins backfilling in a "Monitor Required" area without a cultural resources monitor present.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. The grading crew uncovers buried bottles and fragments of stoneware. The required monitor is on-site at the time. All earthwork is ceased in the area of the find to allow the monitor time to make the necessary notifications and evaluate the discovery.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Answers and Explanations

1. Occurrence. Hazardous material spills should be documented as occurrences if they are cleaned up promptly and appropriately.
2. Occurrence. The fact that the spill occurred in a stream and may have resulted in contamination does not necessarily mean it is a compliance issue or a noncompliance. The spill would still need to get reported to the agencies, but the contractor has not done anything that is out of compliance with the environmental requirements.
3. Noncompliance. While the same as the occurrence in #2, in this scenario the contractor was not in compliance with the project requirements, which likely worsened the impacts of the spill. Even though the spill may still be cleaned up before the end of the day, it would not be a compliance issue because the contractor's failure to maintain response equipment on site exacerbated what would have otherwise been a routine occurrence.
4. Minor Problem. Since there has been no resource damage, this would be documented as a minor problem, as long as the contractor addressed it immediately (i.e., sent someone back to the yard to go get it). If they don't have spill response equipment at the yard because the shipment did not arrive and there is none immediately available in the project area, it would be a noncompliance.
5. Acceptable. You should document that this meeting took place in your daily report because it involves planning ahead to prevent future compliance concerns. Enter this in the Site-Specific Observations section of the report.
6. Noncompliance or Compliance Issue. This would typically be a noncompliance because the project is required to obtain agency approval to use extra workspace beyond what was initially approved. However, since the request had been submitted, it is likely that all necessary preconstruction surveys had been completed and there was no actual resource impact that resulted from premature use of the area. It could potentially be a compliance issue if it was a small amount of spoil, placed with no impact to resources, and it was removed before the end of the day.
7. Noncompliance. This would be a noncompliance because the contractor placed sensitive resources at risk. Since there was a sign installed that was ignored, the activity borders on blatant disregard for the environmental requirements. It could potentially be a compliance issue if there was no sign installed and the crew was unaware of the monitoring requirement when they started work, they only did very minor soil disturbance with no impact to fossils, and they immediately stopped work and waited to re-start until the monitor arrived.
8. Compliance Issue. Typically, monitoring is required for earthwork and backfilling is considered part of earthwork. However, because the trench spoils are already disturbed, if the contractor ceased backfilling until the monitor arrived, it would be a compliance issue rather than a noncompliance (i.e., addressed immediately and no impact to resources). Depending on how the actual mitigation measure reads, this may be acceptable (i.e., if backfilling is not an activity that requires monitoring). If backfilling requires monitoring and this is the second time this particular crew has started backfilling without a monitor present, it would likely be a noncompliance.
9. Occurrence. It is not a violation of the environmental requirements to uncover buried cultural materials, so long as the discovery is handled appropriately.

Appendix G: Notification of Incident Form



SHEPHERD SUBSTATION PROJECT

Notification of Incident Form

Type of Incident:	Choose an item.		
Report Date:	Click here to enter a date.	Initial Observation Date:	Click here to enter a date.
Prepared by:	Click here to enter text.	Observed by:	Click here to enter text.
Reporting Party:	Choose an item.	Observation Party:	Choose an item.

Incident Summary			
Requirement(s) Violated: <i>(Project EPMs, permit conditions, plans, or MMCRP authorizations)</i>			
Click here to enter text.			
Incident Start Date:	Click here to enter a date.	Incident End Date:	Click here to enter a date.
Incident Timeframe:	Click here to enter text.		
Location:		Personnel Present:	
Click here to enter text.		Click here to enter text.	
Description of the Incident: <i>(Describe below)</i>			

Click here to enter text.

Resolution
Corrective Actions Taken: <i>(Describe below)</i>

Click here to enter text.

Notification: When was the alternate (non-reporting) party first notified of the event? <i>(Enter date and describe below)</i>	Click here to enter a date.	
Click here to enter text.		
Follow-up: Are there remaining follow-up actions required? <i>(Enter applicable date and describe below)</i>	Follow-up Date:	Click here to enter a date.
	Follow-up Completed Date:	Click here to enter a date.
Click here to enter text.		

Attached Materials: <i>(e.g., maps, photos, memos, etc.)</i>
Click here to enter text.

Appendix H: Minor Project Change Request Form

SHEPHERD SUBSTATION PROJECT

Minor Project Change Request Form



Proposed Minor Project Change Type:	Request #:
Choose an item.	Click here to enter number.

Part A: Proposed Minor Project Change Summary				
Date Submitted:	Requested Approval Date:	Start Date:	Expected End Date:	
Click here to enter a date.	Click here to enter a date.	Click here to enter a date.	Click here to enter a date.	
Submitted by:	Organization and Title:	Duration and Work Hours:		
Click here to enter text.	Click here to enter text.	Click here to enter text.		
Contact Information:				
Click here to enter text.				
Location(s): <i>(Describe applicable location(s), address, and/or dimensions)</i>				
Click here to enter text.				
Proposed Action(s): <i>(List and describe each proposed action)</i>				
Click here to enter text.				
Purpose(s): <i>(Explain why the proposed action(s) are necessary)</i>				
Click here to enter text.				
Part B: Existing Conditions				
Current and Adjacent Land Use(s):				
Click here to enter text.				
Has landowner approval been granted? <i>(Describe below)</i>		Landowner:	Date of Approval:	Approval Verified by:
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Click here to enter a date.	Click here to enter text.
Click here to enter text.		Click here to enter text.		
Click here to enter text.				

Surveys <i>(List any new survey reports under Part D, attach a copy, and describe relevant survey details under the</i>
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SHEPHERD SUBSTATION PROJECT

Minor Project Change Request Form



<i>applicable resource category listed in the Part E)</i>		
Biological Resources. Were all sites associated with the proposed action(s) surveyed for biological resources with the potential to occur in the area? If so, were survey results positive or negative? Were surveys completed during the appropriate timing and season to detect resources? <i>(If not, describe under the applicable resource category in Part E)</i>	<input type="checkbox"/> Previously Surveyed	<input type="checkbox"/> Positive
	<input type="checkbox"/> Survey Attached	<input type="checkbox"/> Negative
	<input type="checkbox"/> N/A	
Cultural Resources. Were all sites associated with the proposed action(s) surveyed for cultural resources (records search and pedestrian survey)? If so, were survey results positive or negative?	<input type="checkbox"/> Previously Surveyed	<input type="checkbox"/> Positive
	<input type="checkbox"/> Survey Attached	<input type="checkbox"/> Negative
	<input type="checkbox"/> N/A	
Hydrology. Were all sites associated with the proposed action(s) surveyed for hydrologic resources? If so, were survey results positive or negative?	<input type="checkbox"/> Previously Surveyed	<input type="checkbox"/> Positive
	<input type="checkbox"/> Survey Attached	<input type="checkbox"/> Negative
	<input type="checkbox"/> N/A	

Part C: Permits, Agency Approvals, and Environmental Protection Measures (EPMs) <i>(List any new permits or agency approvals under Part D, attach a copy, and describe relevant details under the applicable resource category listed in Part E)</i>		
Have all required permits, permit amendments/authorizations, or agency approvals been issued by resource agencies with applicable jurisdiction?	<input type="checkbox"/> Previously Provided	
	<input type="checkbox"/> Authorization Attached	
	<input type="checkbox"/> N/A	
Would the proposed action(s) conflict with permit conditions or agency approvals?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Would the proposed action(s) conflict with project applicant proposed measures, avoidance and minimization measures, or mitigation measures listed in the Initial Study/Mitigated Negative Declaration (IS/MND)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Part D: Attached Materials: <i>(e.g., surveys, maps, photos, memos, agency authorizations, etc.)</i>
Click here to enter text.

Part E: IS/MND Consistency

SHEPHERD SUBSTATION PROJECT

Minor Project Change Request Form



Impact Question	No Change	<i>De Minimis</i> Change	Potentially Significant Change	N/A
Would the Proposed Action Result in a New Impact, or Increase the Severity of an Impact Previously Analyzed in the IS/MND? Provide information on any new impacts or additional impacts. <i>(Refer to the IS/MND for the details on the project impact evaluation.)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Click here to enter text.				