

Staff Report 01

APPLICANT:

LS Power Grid California, LLC

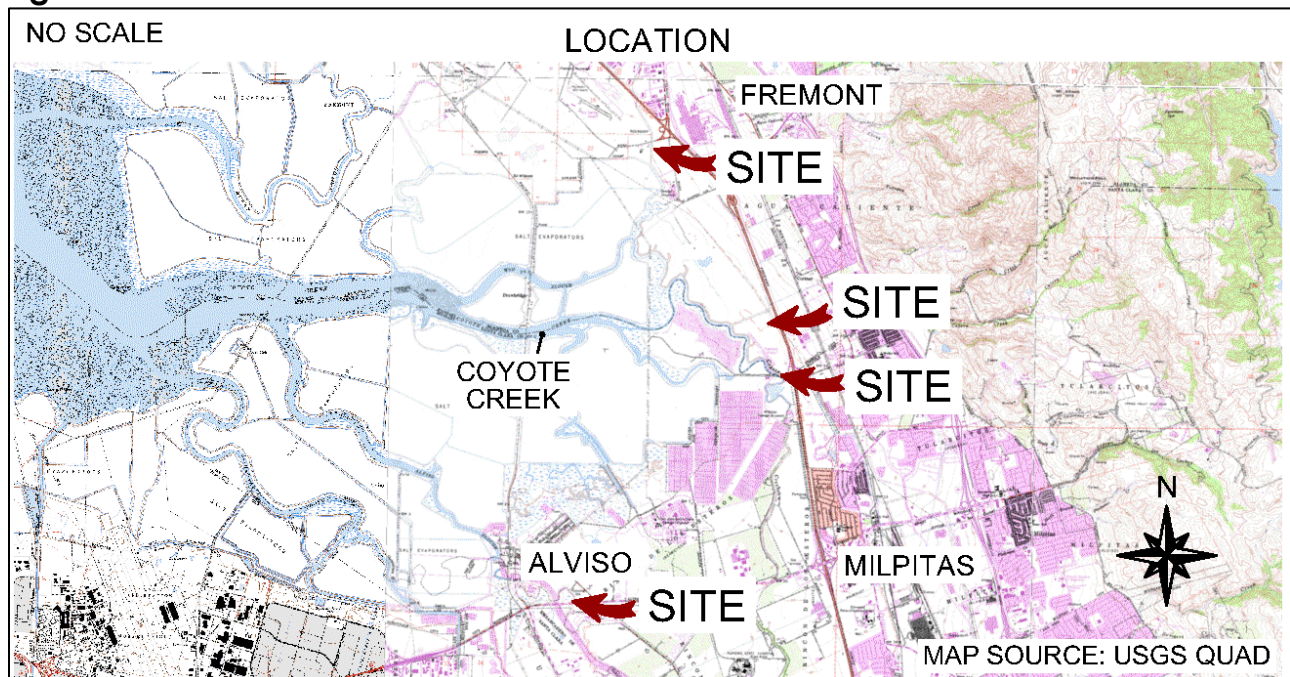
PROPOSED ACTION:

Issuance of a General Lease – Right-of-Way Use.

AREA, LAND TYPE, AND LOCATION:

Sovereign land in the Alameda County Flood Control Channel, Coyote Creek, and Scott Creek, near Fremont, Alameda County; and the Guadalupe River, near San Jose, Santa Clara County (as shown in Figure 1).

Figure 1. Location



AUTHORIZED USE:

Installation and use of 230-kilovolt (kV) electrical cables, communication lines, and ground continuity cables located within various conduits to be installed using surface trenching and horizontal directional drilling (HDD), a communication handhole, and vault (as shown in Figures 2a through 2d).

Figure 2a. Alameda County Flood Control Channel Site Map

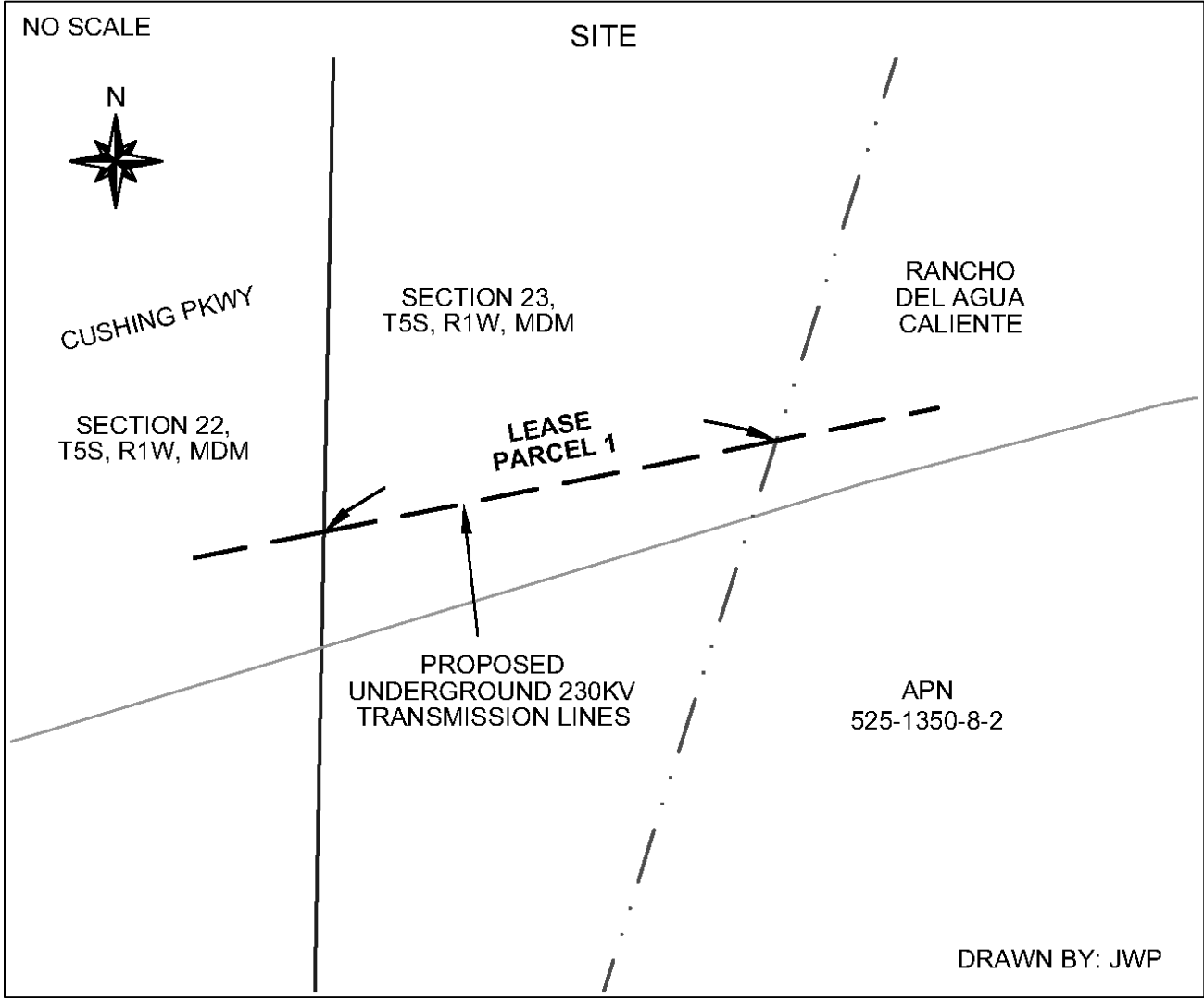


Figure 3b. Scott Creek Site Map

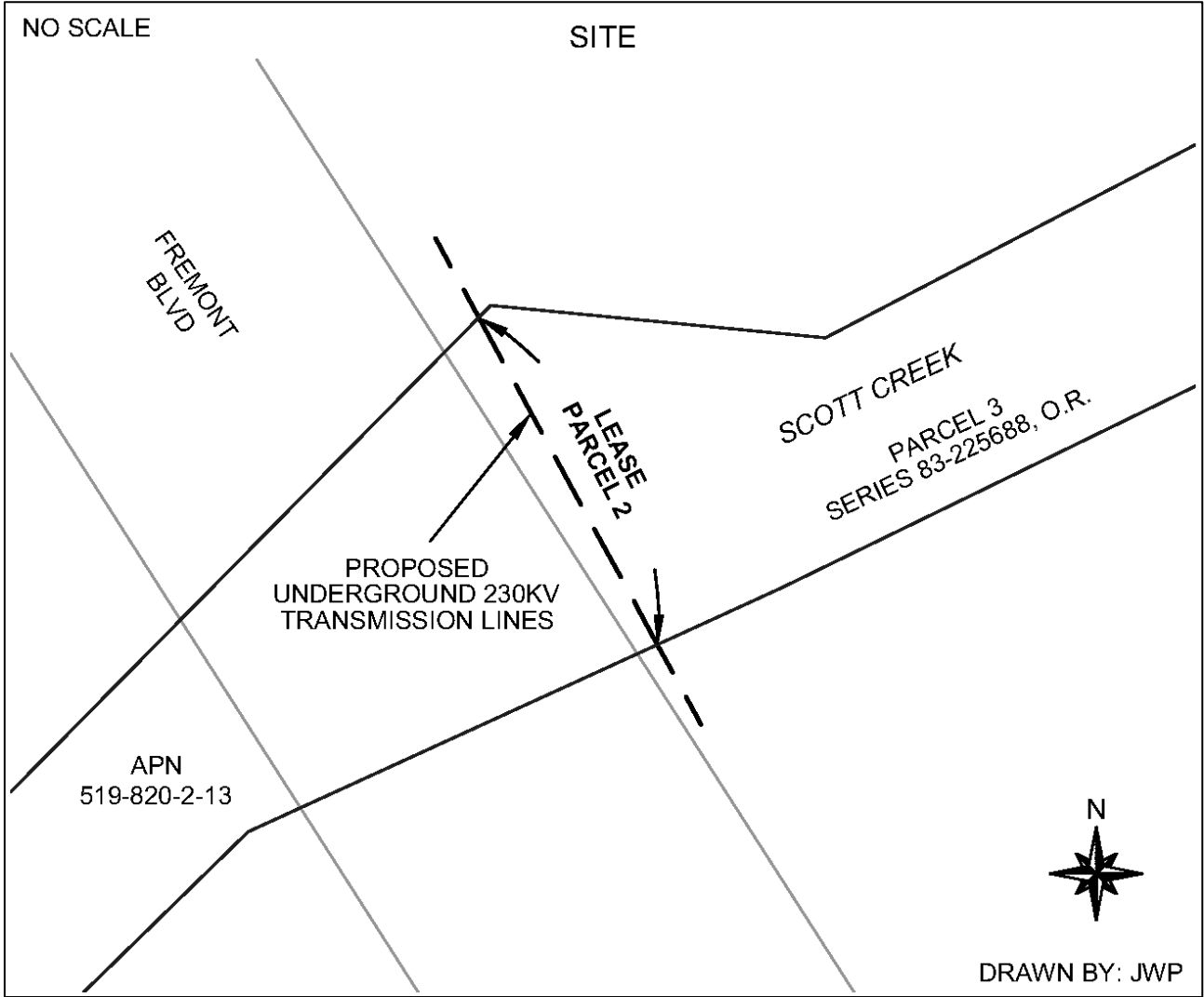


Figure 4c. Coyote Creek Site Map

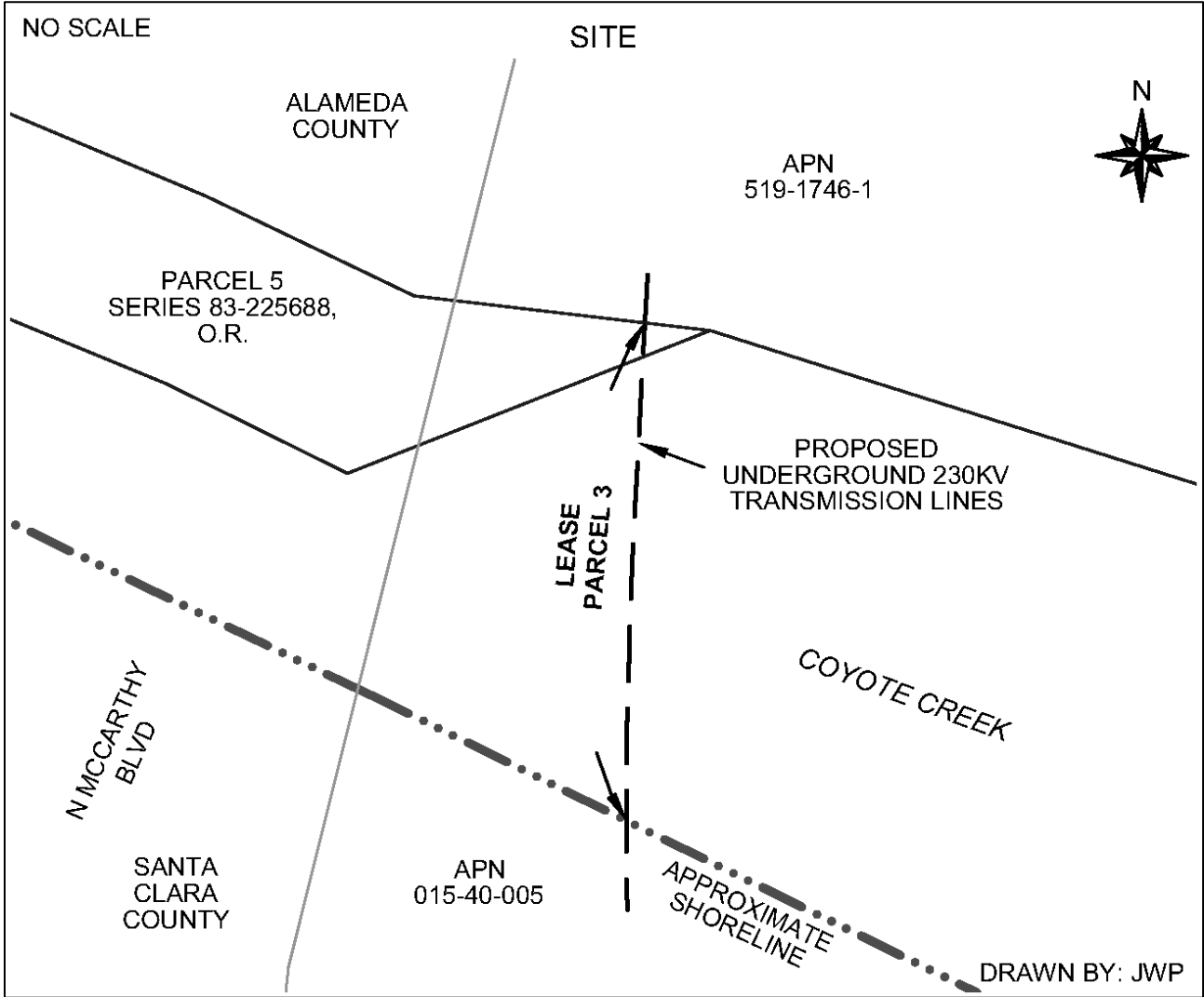
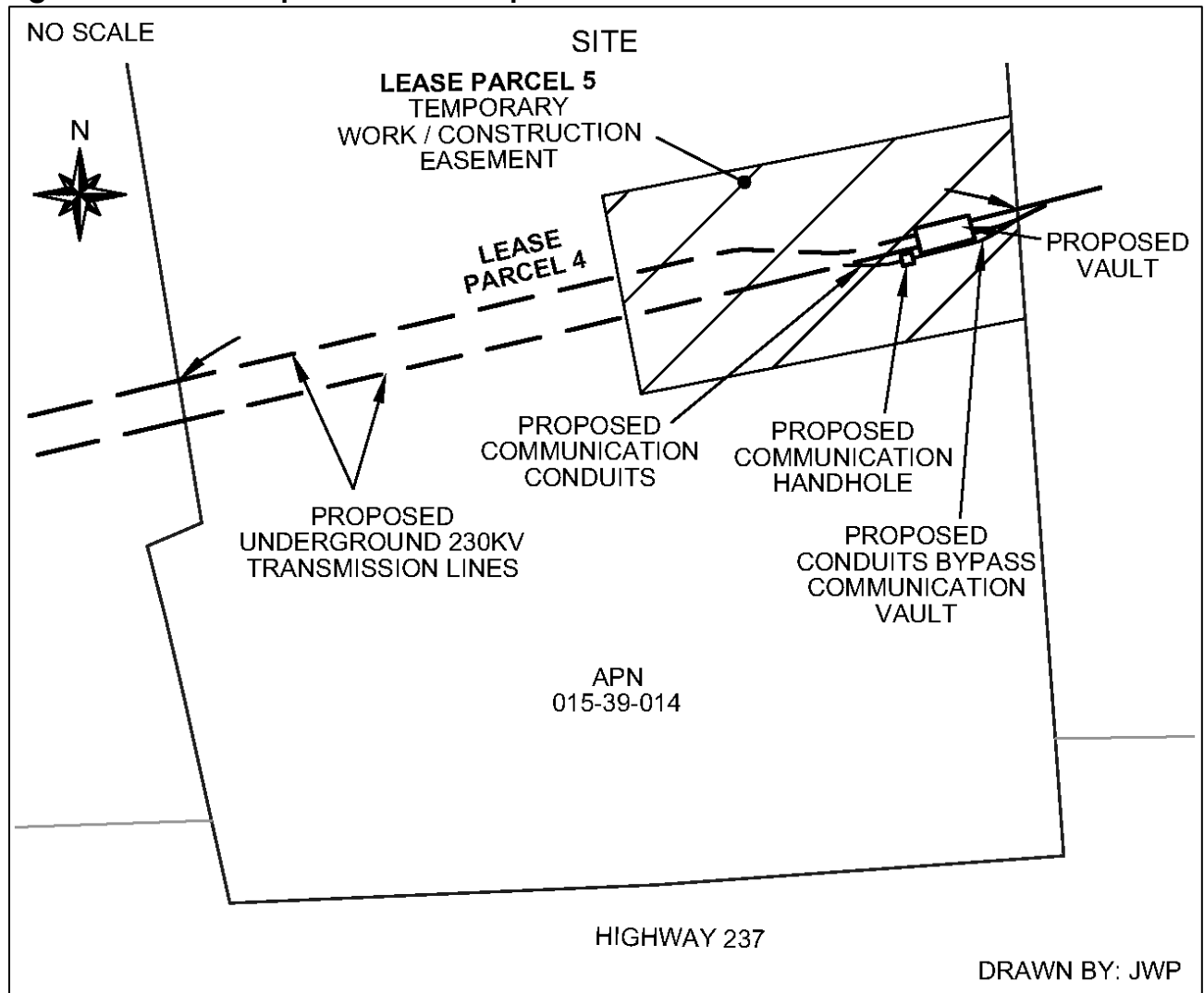


Figure 5d. Guadalupe River Site Map



NOTE: This depiction of the lease premises is based on unverified information provided by the Applicant or other parties and is not a waiver or limitation of any State interest in the subject or any other property.

TERM:

20 years; beginning July 28, 2026.

CONSIDERATION:

\$7,029 per year, with an annual Consumer Price Index adjustment and the State reserving the right to fix a different rent periodically during the lease term, as provided for in the lease.

SPECIFIC LEASE PROVISIONS:

- Liability insurance in an amount no less than \$10,000,000 per occurrence.
- Bond or other surety in the amount of \$500,000.
- Lessee shall fully carry out, implement, and comply with all mitigation measures and reporting obligations applicable to the Lessee as set forth in the Mitigation Monitoring Program.
- At least fifteen (15) days prior to construction within the lease premises, Lessee shall provide Lessor with any updated versions of technical documents, including geotechnical reports, geotechnical memorandum, issued for construction drawings, HDD calculations, hazardous spill contingency plan, inadvertent drilling fluid returns contingency plan, and HDD work execution plan.
- Within sixty (60) days of completion of construction within the lease premises, Lessee shall provide as-built plans certified by a California Registered Civil or Structural Engineer, any inspection or testing results for the conduits, and a post construction written narrative report.
- The Lease includes provisions for emergency repairs reporting and acknowledgement of California Public Utilities Commission regulatory jurisdiction.
- Based on the "as-built" drawings received, Lessor shall then replace Lease Exhibit A (Land Description) and Exhibit B (Site and Location Map) as necessary to accurately reflect the final location of the authorized improvements within the Commission's jurisdiction. Once approved by the Executive Officer (or his designee) and Lessee, the revised Exhibits shall replace the Exhibits incorporated in the Lease at the time of Lease execution. The replaced Exhibits shall be incorporated in the Lease as though fully set forth therein.
- Should staff's review of the as-built plans identify a change in the improvements that necessitates a change in the annual rent, Lessee agrees to submit an application, within 60 days following notice from Lessor's staff, to request a lease amendment to reflect such changes.

STAFF ANALYSIS AND RECOMMENDATION:

AUTHORITY:

Public Resources Code sections 6005, 6216, 6301, 6501.1, and 6503; California Code of Regulations, title 2, sections 2000 and 2003.

PUBLIC TRUST AND STATE'S BEST INTERESTS:

The Applicant is applying for a General Lease – Right-of-Way Use to install new 230kV electrical cables and associated improvements, and new communication lines within sovereign lands under the Alameda County Flood Control Channel, Coyote Creek, Scott Creek, and Guadalupe River, as part of the Applicant's larger "Power the South Bay Project" (Project).

The Project would connect the existing Pacific Gas and Electric Company's (PG&E) Newark substation in Fremont to the existing Silicon Valley Power (SVP) Northern Receiving substation in Santa Clara. The Project's purpose is to strengthen the electrical grid in the Greater Bay Area, specifically within Alameda and Santa Clara counties. The Project would support the provision of safe, reliable, and adequate electrical service to the PG&E and SVP service territories and throughout the South Bay area.

The proposed Project would install approximately 12 miles of transmission lines and communication lines, alternating between overhead and underground. While a majority of the Project takes place outside of the Commission's jurisdiction, the portions occurring within the Commission's jurisdiction will install the various cables and lines within two 36-inch-diameter conduit casings (Casings) using horizontal directional drilling (HDD) and surface trenching methods. Each Casing will contain 230 kV electrical cables encased in three 10-inch diameter conduits, with an additional empty 10-inch-diameter conduit included for future use. Each Casing will also contain three 3-inch-diameter conduits for communication lines and a ground continuity cable, for a total of eight transmission cable conduits and six communication line and ground continuity cable conduits. Each Casing will be installed at a minimum of 30 feet below the waterways, except for the Coyote Creek Crossing which will be installed at a minimum of 20 feet below the creek bed. The Guadalupe River crossing differs slightly from the other three in that a segment of the Project within Parcel 4 would be constructed using surface trenching to install eight separate 8-inch-diameter conduits for the transmission cables, and six separate 2-inch-diameter conduits for the communication lines and

ground continuity cables before transitioning to the HDD-installed Casings under the riverbed. The Guadalupe River crossing will also include a communication handhole and a vault, along with a temporary work/construction easement (Parcel 5). The conduits for the communication lines will pass through the communication handhole and outside the vault for the electrical cables. Parcel 5 will later be removed from the lease premises following completion of construction and receipt of as-built drawings, as required by the lease.

The HDD construction method is a trenchless technique meant to avoid ground surface disturbance along the bore path to minimize impacts to waterways and sensitive habitats. Drill heads entering from one side of the waterway and exiting on the other side of the waterway, outside of the Commission's jurisdiction, would create two separate HDD bore paths under the waterways. The Casings would be installed in each of the bore paths, then the cables, housed in conduits, would be pulled through the Casing. The vault would be a precast concrete vault and used initially for pulling the cables, then later used for splicing the cables together. The handhole would be used for pulling and splicing the communication lines.

The proposed lease does not alienate the State's fee simple interest or permanently impair public rights. In addition, the lease has a limited 20-year term and does not grant the lessee exclusive rights to the lease premises. The proposed HDD Casings would be located well below the bed of the waterways. The communication conduits, handhole, and splice vault would be buried approximately one foot beneath the surface. The facilities do not significantly alter the land or permanently impair public rights and are expected to have no permanent impact on recreational use of the waterways.

Additionally, the proposed lease requires the lessee to maintain a surety bond in the amount of \$500,000 and to insure performance of the lease and indemnify the State for any liability incurred as a result of the lessee's activities thereon. The lease also requires the payment of annual rent to compensate the people of the State for the occupation of the public land involved.

CLIMATE CHANGE:

INTRODUCTION:

The climate crisis and rising sea levels are impacting California's coastal and inland waterways now. Likely impacts to the lease premises include, but are not limited to, sea level rise, saltwater intrusion, prolonged drought, extreme heat, and changes to

the intensity and timing of precipitation events. These impacts can exacerbate natural hydrological processes such as erosion, scour, and sedimentation. These impacts may affect the project components subject to the proposed lease, located in the Alameda Flood Control Channel, Scott Creek, Coyote Creek, and the Guadalupe River.

DATA & PROJECTIONS:

Water levels in tidally-influenced rivers will rise as sea levels rise. The California Ocean Protection Council updated the [State of California Sea Level Rise Guidance](#) in 2024 to provide a synthesis of the best available science on sea level rise projections and rates for multiple emissions scenarios. Commission staff evaluated the “intermediate-high” and “high” scenarios due to the vulnerability and exposure of the lease location and the continued global reliance on fossil fuels. The San Francisco tide gauge was used for the projected sea level rise scenario for the lease area, as listed in Table 1.

Table 1. Projected Sea Level Rise for San Francisco

Year	Intermediate-High (feet)	High (feet)
2040	0.7	0.8
2050	1.0	1.3
2070	2.2	2.9
2100	4.8	6.5

Source: Table 6, State of California Sea Level Rise Guidance: 2024 Update

Note: Projections are with respect to a 2000 baseline.

In addition to rising seas, warmer temperatures have led California and the Southwest region to experience a megadrought from 2000 to 2022, measured as the driest 22 years in the past 1200 years, and more megadroughts are projected through the end of the century ([Fifth National Climate Change Assessment: Southwest Region, 2023](#)). Hotter and drier conditions have led to declines in snowpack volumes, higher-elevation snow lines, earlier snowmelt, and reduced overall runoff. Streamflow and river volumes are lower and will be drawn down farther as temperatures continue to rise and demand for water increases. Despite the region's increasing aridity, flooding from extreme precipitation events is projected to increase, attributed to earlier snowmelt, sea level rise, and more intense and frequent atmospheric rivers. Minor and moderate flooding (flooding events defined as disruptive to damaging), attributed to higher water levels, is expected to increase five to ten orders of magnitude by 2100, according to [NOAA's 2022 Sea Level Rise Technical Report](#).

ANALYSIS:

The lease premises are likely to experience more extreme conditions over the lease term than in the past, due to climate change. Changes to the timing and amount of runoff from the higher elevations of the watershed, stronger storm surge, and rising water levels will result in higher flood risks. Bank stability may be compromised due to increased channel erosion and undercutting from more intense precipitation and floods. However, the conduits would be installed underground, set well back from the bank and at a minimum depth of 20 feet under Coyote Creek and 30 feet under the three other crossings, so they are unlikely to be impacted by adverse weather events, nor would they contribute to climate-driven riverine processes such as scour or erosion.

In addition, the project will also include a temporary construction site and the construction of an underground splice vault upland of the Guadalupe River. The temporary construction site will not be impacted by sea level rise, as the site will be reverted to its pre-construction state after construction is completed. Furthermore, the splice vault will be a sealed concrete box buried at least one foot underground in the upland area with no parts aboveground and is therefore unlikely to be directly impacted by adverse weather events or by climate-driven floods due to increased storm events. The Project's contribution to climate change is limited to the generation of greenhouse gas (GHG) emissions during construction; however, the project would not result in a new long-term source of GHG emissions that would contribute to climate change.

RECOMMENDATION:

Pursuant to the proposed lease, the Applicant acknowledges that both the lease premises and the upland area are located in areas that may be subject to the effects of climate change, including sea level rise.

CONCLUSION:

For all the reasons above, staff believes issuance of the lease will not substantially impair the public rights to navigation, fishing, and commerce, or substantially interfere with the Public Trust needs and values at these locations, at this time, and for the term of the lease; and is in the best interests of the State.

OTHER PERTINENT INFORMATION:

1. Approval or denial of the application is a discretionary action by the Commission. Each time the Commission approves or rejects a use of sovereign land, it exercises legislatively delegated authority and responsibility as trustee of the State's Public Trust lands as authorized by law. The lessee also has no right to a new lease.
2. This action is consistent with the "Meeting Evolving Public Trust Needs" Strategic Focus Areas of the [Commission's 2021-2025 Strategic Plan](#).
3. An Environmental Impact Report (EIR), State Clearinghouse No. 2024071095, was prepared for this Project by the California Public Utilities Commission (CPUC) and certified on March 19, 2026. As part of its project approval, CPUC made a Statement of Facts and Findings and Statement of Overriding Considerations and adopted a Mitigation Monitoring, Compliance, and Reporting Program.

Staff has reviewed these documents and prepared an independent Mitigation Monitoring Program (MMP) (attached, Exhibit A) that incorporates CPUC's document. Staff recommends adoption of Exhibit A by the Commission.

Staff also prepared Findings made in conformance with the California Environmental Quality Act (CEQA) Guidelines (Cal. Code Regs., tit. 14, §§ 15091, 15096), which determined that all potential impacts within the Commission's leasing jurisdiction would be less than significant or less than significant with mitigation. The CPUC's Findings identified that the project could cause a potentially significant impact to Air Quality, despite implementation of mitigation measures, and CPUC prepared a Statement of Overriding Considerations made pursuant to the CEQA Guidelines (Cal. Code Regs., tit. 14, § 15093). These significant impacts, however, are outside the jurisdiction and approval authority of the Commission, and a Statement of Overriding Considerations is not required by the Commission. Staff recommends the Commission adopt the Findings contained in the attached Exhibit B.

4. This activity involves lands which have NOT been identified as possessing significant environmental values pursuant to Public Resources Code section 6370 et seq.; however, the Commission has declared that all lands are significant by nature of their public ownership (as opposed to environmentally significant). Since such declaration of significance is not based upon the requirements and criteria of Public Resources Code section 6370 et seq., use classifications for such lands have not been designated. Therefore, the finding of the project's

consistency with the use classification as required by California Code of Regulations, title 2, section 2954 is not applicable.

APPROVALS REQUIRED:

- U.S. Army Corps of Engineers
- U.S. Fish and Wildlife Service
- California Department of Fish and Wildlife
- San Francisco Bay Conservation and Development Commission

EXHIBITS:

- A. Mitigation Monitoring Program
- B. Statement of Findings

RECOMMENDED ACTION:

It is recommended that the Commission:

CEQA FINDING:

Find that an EIR, State Clearinghouse No. 2024071095, was prepared for this project by CPUC and certified on March 19, 2026, and that the Commission has reviewed and considered the information contained therein; that in the Commission's independent judgment, the scope of activities to be carried out under the lease to be issued by this authorization have been adequately analyzed; that none of the events specified in Public Resources Code section 21166 or CEQA Guidelines section 15162 resulting in any new or substantially more severe significant impacts have occurred; and, therefore no additional CEQA analysis is required.

Adopt the Mitigation Monitoring Program, as contained in the attached Exhibit A.

Adopt the Findings, made in conformance with California Code of Regulations, title 14, sections 15091 and 15096, subdivision (h), as contained in the attached Exhibit B.

Determine that the project, as approved, will not have a significant effect on the environment within the Commission's jurisdiction.

PUBLIC TRUST AND STATE'S BEST INTERESTS:

Find that the proposed lease will not substantially interfere with Public Trust needs and values at this location, at this time and for the proposed term of the lease; and is in the best interests of the State.

AUTHORIZATION:

1. Authorize issuance of a General Lease – Right-of-Way Use to the Applicant beginning July 28, 2026, for a term of 20 years, for installation and use of 230 kV electrical cables, communication lines, and ground continuity cables located within various conduits to be installed using surface trenching and horizontal directional drilling (HDD), a communication handhole, and vault as described in the lease; annual rent in the amount of \$7,029 with an annual Consumer Price Index adjustment; liability insurance in an amount no less than \$10,000,000 per occurrence; and bond or other surety in an amount no less than \$500,000.
2. Authorize the Executive Officer or designee to replace Exhibits in the lease upon submission, review, and approval of as-built plans detailing the final location of the new improvements following construction.

EXHIBIT A

**CALIFORNIA STATE LANDS COMMISSION
MITIGATION MONITORING PROGRAM
Power the South Bay
(A5037, State Clearinghouse No. 2024071095)**

The California State Lands Commission (Commission or CSLC) is a responsible agency under the California Environmental Quality Act (CEQA) for the Power the South Bay Project (Project). The CEQA lead agency for the Project is the California Public Utilities Commission.

In conjunction with approval of this Project, the Commission adopts this Mitigation Monitoring Program (MMP) for the implementation of measures for the portion(s) of the Project located on State lands. The purpose of an MMP is to impose feasible measures to avoid or substantially reduce the significant environmental impacts from a project identified in an Environmental Impact Report (EIR) or a Mitigated Negative Declaration (MND). [State CEQA Guidelines section 15097, subdivision \(a\)](#), states in part:

In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

The lead agency certified an EIR, State Clearinghouse No. 2024071095, adopted a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) for the whole of the Project (see Exhibit A, Attachment A-1), and remains responsible for ensuring that implementation of the measures occurs in accordance with its program. The Commission's action and authority as a responsible agency apply only to the measures listed in Table A-1 below. The full text of each measure, as set forth in the MMCRP prepared by the CEQA lead agency and provided in Attachment A-1, is incorporated by reference in this Exhibit A.

Table A-1. Project Impacts and Applicable Measures

Potential Impact	Mitigation Measure (MM), Applicant Proposed Measure (APM), PG&E Field Protocol (FP), PG&E Best Management Practices (BPM)¹
Impacts 3.1-2 and C.3.1-2	MM 3.1-2 and APM BIO-10
Impacts 3.3-1 and C.3.3-1	MMs 3.3-2a and MM 3.3-2b
Impacts 3.3-2 and C.3.3-2	MMs 3.3-2a and MM 3.3-2b
Impacts 3.3-3 and C.3.3-3	MM 3.3-2a and MM 3.3-2b
Impacts 3.4-1 and C.3.4-1	APMs BIO-1 through BIO-6, APMs BIO-8 through BIO-13, APMs BIO-15 through BIO-19, PG&E BMP BIO-2, PG&E FP-1, PG&E FP-4, PG&E FP-6, PG&E FP-8, PG&E FP-10, PG&E FP-16, MM 3.1-2, and MM 3.4-1a through MM 3.4-1e
Impact 3.4-2	APM BIO-1, APM BIO-4, APM BIO-19, MM 3.4-1b, and MM 3.4-1d
Impacts 3.4-3 and C.3.4-3	APM BIO-1, BIO-4, BIO-19, PG&E FP-1, PG&E FP-14 through FP-16, and MM 3.4-1b
Impact 3.4-4	APM BIO-1, APM BIO -4, APM BIO-6, APM BIO-9, APM BIO-10, APM BIO-17, PG&E BMP BIO-2, PG&E FP-1 through FP-4, PG&E FP-6, PG&E FP-10 through FP-12, PG&E FP-14 through FP-16, and MM 3.4-1b through MM 3.4-1e
Impact 3.5-1	APM CUL-1 through APM CUL-4, PG&E BMPs CULT-1 and CULT-2, MM 3.5-1, and MM 3.5-2
Impact 3.5-2	APM CUL-1, APM CUL-2, APM CUL-5, PG&E BMP CULT-1, PG&E BMP CULT-3, MM 3.5-1, and MM 3.5-2
Impact C.3.5-1	MM 3.5-1 and MM 3.5-2
Impact 3.9-1	APM HAZ-1, APM HAZ-2, PG&E BMP HAZ-2, PG&E BMP HAZ-3, PG&E BMP HAZ-7, and MMs 3.9-1a through 3.9-1c
Impact 3.9-3	APMs HAZ-2 through HAZ-4, PG&E BMP HAZ-3, and MMs 3.9-1a through 3.9-1c

¹ See Attachment A-1 for the full text of each measure taken from the MMCRP prepared by the CEQA lead agency.

Potential Impact	Mitigation Measure (MM), Applicant Proposed Measure (APM), PG&E Field Protocol (FP), PG&E Best Management Practices (BPM)¹
Impacts 3.10-1 and C.3.10-1	APM WQ-1, APM BIO-17, PG&E FP-11, PG&E FP-12, and MM 3.4-1c
Impacts 3.10-4 and C.3.10-4	APMs HAZ-1 through HAZ-4, and MMs 3.9-1a through 3.9-1c
Impacts 3.10-6 and C.3.10-6	APM WQ-1 and MM 3.4-1c
Impact 3.18-1	APMs CUL-1 through CUL-5, APM TCR-1, TCR-2, PG&E BMP CULT-1, PG&E BMP CULT-3, MM 3.5-1, and MM 3.5-2
Impact 3.18-2	APMs CUL-1 through CUL-5, APM TCR-1, TCR-2, PG&E BMPs CULT-1 through CULT-3, MM 3.5-1, and MM 3.5-2
Impact C.3.18--2	APMs CUL-1 through CUL-5, APM TCR-1, TCR-2, PG&E BMPs CULT-1 through CULT-3, MM 3.5-1, and MM 3.5-2

ATTACHMENT A-1

**Mitigation Monitoring, Compliance, and Reporting Program Adopted by the
California Public Utilities Commission**

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



CONSTRUCTION MITIGATION MONITORING, COMPLIANCE, AND REPORTING PROGRAM

LS Power Grid California's Power the South Bay Project

1 Introduction

This document is an expanded version of the mitigation monitoring, compliance, reporting, and program (MMCRP) adopted by the California Public Utilities Commission (CPUC) in its approval of the LS Power Grid California, LLC (LSPGC) Power the South Bay Project (Project) pursuant to Application No. 24-05-014. This Construction MMCRP includes Applicant-proposed measures (APMs) proposed by LSPGC, as well as all mitigation measures identified by the CPUC to reduce potentially significant impacts to less than significant.

Pacific Gas and Electric Company (PG&E) has also committed to implementing its own best management practices (BMPs) and field protocols (FPs) on portions of the Project it would construct and operate, specifically work within the existing PG&E Newark 230 kV Substation and the interconnection line to the LSPGC transmission line. Silicon Valley Power (SVP) would be responsible for interconnection activities within its existing Northern Receiving Station (NRS) 230 kV Substation; however, SVP is not subject to the compliance activities in this Construction MMCRP.

On March 19, 2026, the CPUC approved the Project and granted LSPGC a certificate of public convenience and necessity (CPCN) and certified the CPUC's Final Environmental Impact Report (Final EIR; SCH No. 2024071095) for the Project, including the mitigation measures outlined in this document. Following Project approval, this Construction MMCRP serves as a self-contained general reference for the Project approved by the CPUC to ensure that all measures are implemented as adopted. This Construction MMCRP builds on the Final EIR's MMCRP (Final EIR Appendix G) to include more detailed information regarding implementation of mitigation during Project construction, including identifying responsible parties, the responsibilities of each party, and procedures for minor project refinements, compliance reporting, dispute resolution, and construction schedule and communication protocols.

1.1 California Public Utilities Commission – MMCRP Authority

The California Public Utilities Code in numerous places confers authority upon the CPUC to regulate the terms of service and the safety, practices, and equipment of utilities subject to its jurisdiction. It is the standard practice of the CPUC, pursuant to its statutory responsibility to protect the environment, to require that mitigation measures stipulated as conditions of approval are implemented properly, monitored, and reported on. In 1989, this requirement was codified statewide as Section 21081.6 of the

Public Resources Code. Section 21081.6 requires a public agency to adopt a reporting or monitoring program when it adopts a mitigated negative declaration for a project that could have potentially significant environmental effects. California Environmental Quality Act (CEQA) Guidelines Section 15097 was added in 1999 to further clarify agency requirements for mitigation monitoring and reporting.

The purpose of an MMCRP is to ensure that measures adopted to mitigate or avoid significant impacts of a project are implemented. The CPUC views the MMCRP as a working guide to facilitate not only the implementation of mitigation measures by the project proponent, but also the monitoring, compliance, and reporting activities of the CPUC and any monitors it may designate.

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

1.2 Project Location and Overview

The Project is located in Alameda and Santa Clara counties and the cities of Fremont, Milpitas, San José, and Santa Clara in the South San Francisco Bay region. It will originate at PG&E's Newark 230 kV Substation in the north and terminate at the SVP 230 kV NRS Substation in the south.

The Project primarily consists of a new 230-kilovolt (kV) alternating current (AC) transmission line that would be constructed and operated by LSPGC, plus improvements at PG&E's Newark 230 kV Substation and SVP's NRS 230 kV Substation, pursuant to CPUC General Order (GO) 131-D.¹ The Project is located primarily in the cities of Fremont, Milpitas, San José, and Santa Clara within Alameda and Santa Clara counties. It would originate at the existing PG&E Newark 230 kV Substation to the north and terminate at the SVP NRS 230 kV Substation to the south. The transmission line would extend approximately 12 miles alternating between overhead and underground for 2 and 10 miles, respectively. The construction of the transmission line would include installation and/or modification of 15 overhead transmission structures. In addition, the Project would also include telecommunication infrastructure that would be co-located with the transmission line, which would include two telecommunication fiber optic cables.

The CPUC review concluded that implementation of the Project would result in one significant unmitigable impact related to air quality. This impact is related to SVP's interconnection work within the SVP NRS 230 kV Substation to accommodate the Project. All other impacts would be mitigated to less-than-significant levels or would be less than significant without the need for mitigation measures. LSPGC has agreed to incorporate all the CPUC-recommended mitigation measures into the Project. Likewise, PG&E has committed to implementing all BMPs and FPs applicable to the portions of the Project for which it is responsible. The CPUC Energy Division has circulated the EIR for public review. In the decision approving the Project, the CPUC certified the Final EIR and adopted the MMCRP enclosed

¹ On January 30, 2025, in Decision 25-01-055, the CPUC adopted General Order 131-E (GO 131-E), which supersedes GO 131-D. However, as LSPGC filed its CPCN application prior to the adoption of GO 131-E, the EIR was prepared pursuant to the protocol under GO 131-D.

therein as Appendix G, which specifies the required mitigation measures, APMs, PG&E BMPs, and PG&E FPs.

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

- Agriculture and Forestry Resources
- Noise
- Mineral Resources
- Population and Housing

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

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology, Soils, Seismicity, and Paleontological Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

It should be noted that certain air quality impacts attributable to Project work within the NRS 230 kV Substation could not be reduced below significance thresholds because the CPUC has no enforcement jurisdiction over any Project work executed by SVP. This is explained in detail in Final EIR Volume I, Section 3.3, *Air Quality*, and Section 5.2, *Significant Unavoidable Environmental Effects*.

2 Roles and Responsibilities

As the lead agency under CEQA, the CPUC is required to monitor the Project to ensure that the required mitigation measures, APMs, PG&E BMPs, and PG&E FPs for the Project, as adopted and included in this Construction MMCRP, are implemented. The CPUC is responsible for ensuring full compliance with the provisions of this Construction MMCRP and has primary responsibility for implementation of the monitoring program. The purpose of the monitoring program is to document that the mitigation measures, APMs, PG&E BMPs, and PG&E FPs required and relied upon by the CPUC are implemented and that the mitigated environmental impacts are reduced to a less-than-significant level. The CPUC has the authority to halt any activity associated with the Project if the activity is determined to be a deviation from the approved Project or the adopted APMs and mitigation measures. PG&E will be responsible for reporting compliance with its own BMPs and FPs to the CPUC.

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

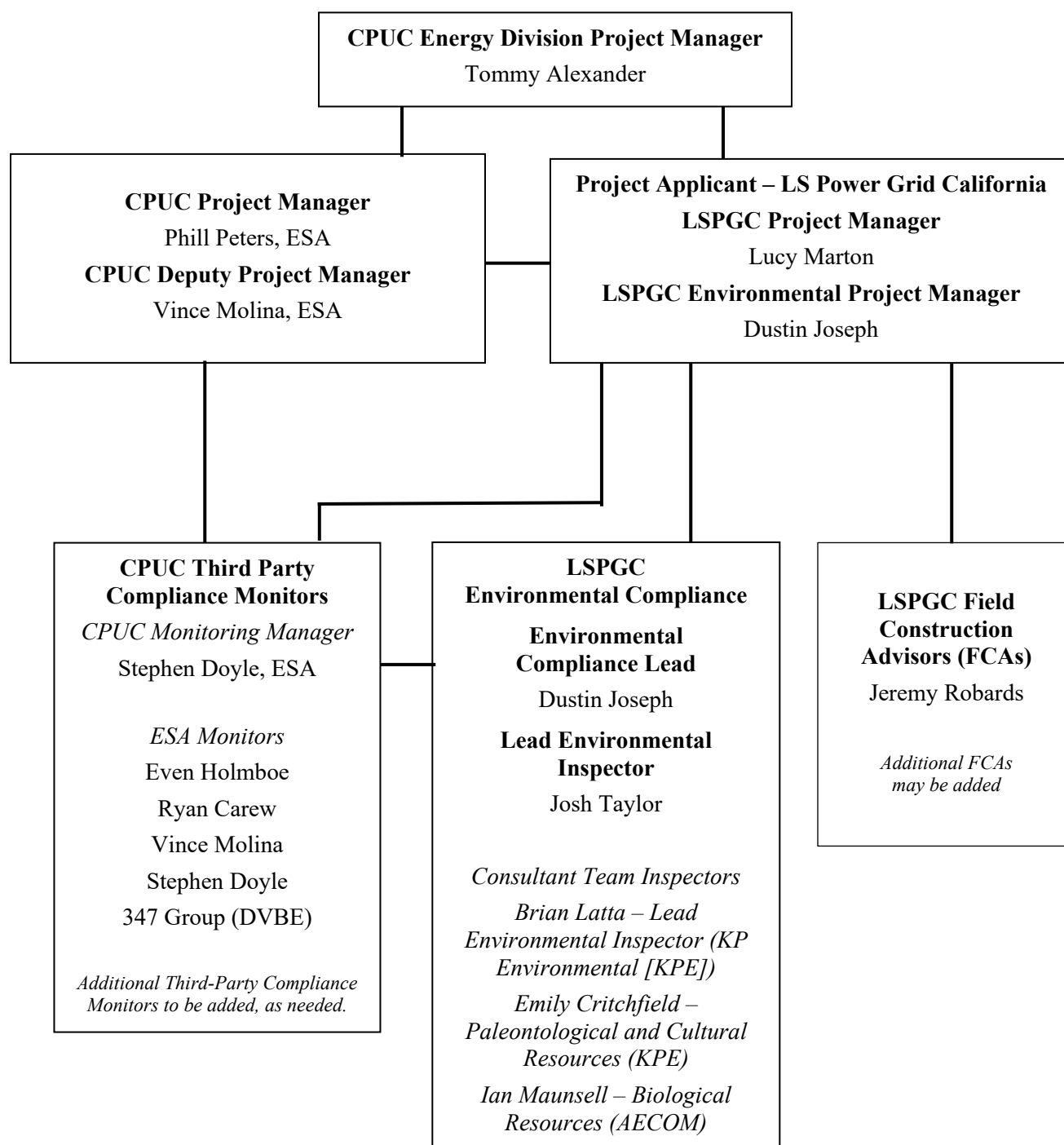
Consistent with CEQA Guidelines section 15097(a), the CPUC may delegate duties and responsibilities for monitoring to other mitigation monitors or consultants as deemed necessary. The CPUC will ensure that the person(s) delegated any duties or responsibilities are qualified to monitor compliance.

The CPUC, along with its mitigation monitor, will ensure that any minor Project refinement process follows procedures and requirements outlined in Section 2.4 of this MMCRP, and any deviation from the procedures identified under the monitoring program, is consistent with CEQA requirements. The CPUC may approve requests by LSPGC for minor Project refinements that may be necessary due to the final engineering of the Project, change in existing site conditions, local permit conditions, or to facilitate safe and efficient construction. The CPUC may approve such requests so long as such minor Project refinements are located within the geographic boundary of the study area of the EIR.

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

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

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

Figure 1 Organizational Chart

Legend: Green lines represent the primary communications pathway²

² This organizational chart presents primary communication pathways only and **does not preclude** communication among various CPUC or Project proponent field staff (e.g., Compliance Monitors, Environmental Consultants, and FCAs).

As noted in Section 1, *Introduction*, PG&E has committed to implementing its own BMPs and FPs when completing its work within the existing PG&E Newark 230 kV Substation and constructing the interconnection line to the LSPGC transmission line on PG&E property immediately outside the substation. In its letter commenting on the Project's Draft EIR,³ PG&E committed to implementing all BMPs and FPs applicable to the portion of the Project for which it is responsible. PG&E is not an applicant for this Project, but has nonetheless committed to implement the BMPs and FPs herein and will submit monitoring reports documenting compliance with those measures to the CPUC for the Project administrative record.

2.1 CPUC Mitigation Monitoring Team

2.1.1 CPUC Energy Division Project Manager

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

2.1.2 CPUC Monitoring Manager

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

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

Deputy Monitoring Managers (DMM) may also be designated to stand in for the CPUC MM when needed and carry out assigned tasks. Any reference to the CPUC MM in this Construction MSCR may be assumed to also apply to the DMM when such designation is in effect.

³ California Public Utilities Commission, November 2025, revised December, 2025. *LS Power Grid California's Power the South Bay Project, Final Environmental Impact Report, Volume III – Comments and Responses to Comments on the Draft Environmental Impact Report*. State Clearinghouse No. 2024071095. Letter UT2, Pacific Gas and Electric Company.

2.1.3 CPUC Third-Party Compliance Monitors

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

- Inspect the Project site(s), document construction and compliance activities,
- Report any potential compliance incidents,
- Conduct monitoring activities consistent with subject-specific monitoring plans, and
- Prepare and submit daily monitoring reports (for each day monitored) to the CPUC MM and relay any important information to the CPUC about the Project, including any issues that occur in the field.

Many of the monitoring and compliance procedures will be conducted during the construction phase of the Project. LSPGC is responsible for integrating the mitigation monitoring procedures into the construction process in coordination with the CPUC and its third-party compliance monitoring staff. To oversee the monitoring procedures and to ensure success, the third-party compliance monitor assigned to the construction must be on site during any portion of LSPGC's construction that has the potential to create a significant environmental impact or other impact for which mitigation is required. The third-party compliance monitor is responsible for monitoring that all procedures specified in this Construction MMCRP are followed by LSPGC and its contractors.

2.2 LSPGC Compliance Personnel

2.2.1 LSPGC Project Manager

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

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

2.2.2 LSPGC Environmental Project Manager

LSPGC is responsible for designating at least one person to supervise the day-to-day compliance and permitting effort. The LSPGC Environmental Project Manager (EPM) may perform any duties that are delegated by the LSPGC PM. The LSPGC EPM is responsible for the overall management of environmental compliance and directly coordinates the activities of the LSPGC Environmental Compliance Lead (ECL), specialty monitors, and other field personnel as necessary. The EPM is the

CPUC's main point of contact for compliance-related issues. The EPM also communicates with Project management and construction personnel to ensure environmental compliance and Project adherence to measures contained in the Project's Construction MMCRP. In addition to the above, the EPM responsibilities include, but not be limited to, the following:

- Communicate as needed with the LSPGC PM and ECL, and other Project staff on environmental issues, including potential noncompliance events;
- Understand and plan for Project requirements, environmental staffing needs, and construction needs;
- Coordinate LSPGC's environmental personnel, and ensure that qualified monitoring personnel are available and informed of the Construction MMCRP responsibilities and have been approved by the CPUC when applicable;
- Communicate environmental requirements to the LSPGC ECL and FCAs;
- Communicate with the CPUC Mitigation Monitoring Team regarding environmental requirements, construction needs, construction schedule changes, and Construction MMCRP procedures;
- Review and confirm field compliance with Project requirements;
- Report the effectiveness of mitigation and regularly submit required reports and documentation to the CPUC;
- Provide leadership to correct any issues with regard to environmental compliance; and
- Participate in meetings and communicate with the CPUC PM and/or CPUC MM as needed to support the Project.

2.2.3 LSPGC Environmental Compliance Lead

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

2.2.4 LSPGC Lead Environmental Inspector

LSPGC is responsible for designating at least one Lead Environmental Inspector (LEI), or an appropriate delegate trained to fulfill the role of the LEI, who can be present at the Project site on a daily basis to oversee and verify the Project compliance effort. The LSPGC LEI works closely with construction personnel and is the primary field employee responsible for verifying and documenting environmental compliance for LSPGC. The LSPGC LEI's responsibilities include, but are not limited to, the following:

- Understanding environmental Project requirements and construction needs;
- Taking direction from the LSPGC EPM and ECL;
- Communicating construction needs and possible conflicts with environmental requirements to the LSPGC EPM and ECL;

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

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

2.2.5 LSPGC Field Construction Advisor

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

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

2.3 Enforcement and Responsibility

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

The CPUC will oversee LSPGC's implementation of the procedures for monitoring through the third-party compliance monitors. The monitors will note any problems with implementation of mitigation, notify appropriate agencies or individuals about such problems, and report the problems to the CPUC. The CPUC has the authority to halt any construction, operation, or maintenance activity associated with the Project if the activity is determined to be a deviation from the approved Project or adopted APMs or mitigation measures. The CPUC may assign its authority to its third-party compliance monitors.

The CPUC will enforce failure of LSPGC and its contractors to comply with the adopted mitigation measures and APMs. Enforcement may include implementing corrective actions to rectify environmental damages and/or to address any procedural deficiencies that led to the failure, including amending this Construction MMCRP.

The CPUC may pursue additional enforcement through other means, including implementation of the CEQA Citation Program pursuant to Commission Resolution E-4550 (May 9, 2013).

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

2.4 Minor Project Refinements

2.4.1 LSPGC

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

Minor project refinements are limited to changes that do not trigger additional discretionary permit requirements, do not increase the severity of an impact or create a new significant impact, are within the

study area of the EIR, and clearly and strictly comply with the intent of the applicable mitigation measure(s). The CPUC PM will evaluate any proposed changes from the approved Project to determine whether they are consistent with the Project as approved by the CPUC, as well as with the approved CEQA mitigation requirements. If the CPUC PM determines the changes requested by LSPGC to be consistent with the approved Project and CEQA mitigation requirements, the requested change(s) would be processed as a minor project refinement by the Energy Division using the Minor Project Refinement Form (**Appendix B**). Requests for minor project refinements must be made in writing and sent electronically to the CPUC PM, with a copy to the CPUC MM.

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

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

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

2.4.2 PG&E

As PG&E is not an applicant for this Project, this minor project refinement process is not applicable to any portion of the Project under PG&E's responsibility. However, as noted in the introduction to this section, PG&E is subject to reporting responsibilities pursuant to this Construction MMCRP. If PG&E identifies any modifications to its portion of the Project, it should use the Minor Project Refinement Form in Appendix B to document the consistency of those modifications with the impact findings and conditions in the Final EIR and MMCRP—i.e., to demonstrate that the modifications comply with the intent of the adopted BMPs and FPs and would not trigger new discretionary permit requirements, increase the severity of an impact, or create a new impact—then send the form to the CPUC PM, copying the CPUC MM, for CPUC concurrence.

2.5 Mitigation Compliance Responsibility

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

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

2.5.1 Dispute Resolution Process

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

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

2.5.2 LSPGC Monitoring and Compliance Reports

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

Weekly "Look Ahead" Reports

LSPGC will submit weekly "look ahead" status reports on Fridays communicating the upcoming anticipated construction activities. The look ahead reports will forecast activities for at least the upcoming week, and will additionally forecast activities two weeks beyond the upcoming week when available and

relevant (i.e., a three week look ahead). The look ahead reports will include the type of work activity (i.e., clearing vegetation, grading, trenching, or the construction of structures), locations for each work activity, and the days for each planned activity. The CPUC mitigation monitoring team will communicate with the LEI to confirm daily work locations and schedule, as needed. The LSPGC EPM/ECL/FCA shall immediately contact the CPUC MM and DMM when the anticipated construction schedule changes monitoring needs outside the weekly look ahead update.

Daily Monitoring Reports

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

Compliance Summary Reports

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

Quarterly Reports

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

Non-Compliance Incidents and Stop Work Orders

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

- **Minor Deviation.** This level indicates that a minor deviation from an APM, approved project element, or mitigation measure has been identified and action is being taken in the field to immediately remedy the situation. No resources are being impacted and no potential for resource

damage exists. If a minor deviation is not expeditiously corrected, it would become a non-compliance issue.

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

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

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

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

1. Monitor or other project personnel observes a potential non-compliance.
2. The Monitor immediately notifies the LEI, who notifies the FCA and ECL. Either the FCA or LEI will implement a temporary stop work order if warranted.
3. The ECL will immediately notify the CPUC. If the ECL is unavailable, either the LEI or LSPGC Project Manager may notify the CPUC.
4. The LEI will work with the ECL and FCA to implement corrective actions if needed to prevent further noncompliance or impact to resources.

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

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

2.5.3 CPUC Monitoring and Compliance Reporting

Third Party Compliance Monitor

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

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

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

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

The CPUC third-party compliance monitors may discuss construction procedures directly with the FCA, but such discussions should generally be limited to basic questions pertaining to clarification of daily project activities and mitigation measure compliance as they relate to monitoring responsibilities. The CPUC third-party compliance monitors will not provide work direction to the contractor or LSPGC’s environmental monitors and will avoid directing questions to the construction crews, unless previously specifically approved by LSPGC LEI or the CPUC PM.

CPUC Monitoring Manager

The CPUC MM/DMM will provide a weekly report to the CPUC PM compiled from the third-party monitor daily logs summarizing mitigation implementation and updates on any corrective actions. This schedule may be altered at the discretion of the CPUC PM in consultation with the CPUC MM depending on the construction activity occurring at a given time or the presence/absence of resources in the current area of activity.

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

2.6 Construction Schedule and Communication Procedures

2.6.1 Construction Schedule

In the event that situations occur requiring major changes pertaining to the construction schedule, LSPGC will keep the CPUC mitigation monitoring team informed. The construction of the Project is estimated to begin in March 2026 and conclude by June 2028.

2.6.2 Communications

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

Field Staff Communication

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

Third-Party Compliance Monitor

The third-party compliance monitor's primary point of contact in the field is the LEI. The third-party compliance monitor will contact the LEI if an activity is observed that conflicts with one or more of the MMs or APMs so that the situation can be corrected. If the third-party compliance monitor cannot immediately reach the LEI, then the FCA, CM, LSPGC EPM, LSPGC PM, or ECL will be contacted to

address the problem. The third-party compliance monitors will then promptly notify the CPUC MM and CPUC PM of the problem and what resolution, if any, has been already implemented. The third-party compliance monitors will not direct the contractor unless specifically provided for in the text of the mitigation measure and/or APM; however, the third-party compliance monitors have the authority to stop work, assuming it is safe to do so, if an activity poses an imminent threat or puts a sensitive resource at undue risk (e.g., stopping a clearing crew from unknowingly clearing vegetation in an exclusion area).

CPUC Monitoring Manager

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

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

LSPGC EPM/ECL and LSPGC FCA

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

Construction Personnel

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

- LSPGC shall require all contractors to comply with the conditions of Project approval, including all adopted APMs and mitigation measures.
- One or more pre-construction meetings will be held to inform and train all construction personnel about the requirements of the Construction MMCRP. This will be incorporated into the WEAP Training that all project personnel must complete.
- A written summary of mitigation monitoring procedures will be provided to construction supervisors for all adopted APMs and mitigation measures requiring their attention.

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

2.6.3 Public Access to Records

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

2.6.4 Condition Effectiveness Review

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

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

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

2.7 Mitigation Monitoring, Compliance, and Reporting Program

The table attached to this Construction MMCRP as Appendix A contains all of the adopted LSPGC APMs, LSPGC mitigation measures, PG&E BMPs, and PG&E FPs in the Final EIR, as adopted and ordered by the CPUC. The purpose of the table is to provide a single comprehensive list of impacts, LSPGC mitigation measures, LSPGC APMs, PG&E BMPs, PG&E FPs, monitoring and reporting requirements, and timing. LSPGC proposed APMs to minimize the environmental impacts of the Project, but in some instances, those APMs have been superseded or supplemented by CPUC mitigation measures, as described in the EIR. The table in Appendix A identifies only those APMs that have not been superseded and that will be implemented as part of the Project.

Appendix A

Mitigation Monitoring, Compliance, and Reporting Program

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Aesthetics	Scenic Quality	APM BIO-1: Described below in Biological Resources.			
Aesthetics	Lighting	APM BIO-10: Outdoor Lighting Measures: Described below in Biological Resources.			
Aesthetics	Lighting	Mitigation Measure 3.1-2: Minimize Fugitive Light from Temporary Sources Used for Construction: The use of outdoor lighting shall be minimized during construction, operations, and maintenance. Photocell and motion detection-controlled lighting shall be provided at a level sufficient to provide safe entry and exit to the Project work sites and to ensure the security of the sites. All lighting shall be selectively placed, shielded, and directed to minimize fugitive light. Portable lights shall be operated at the lowest feasible wattage and height. The number of nighttime lights used shall be limited to those necessary to accomplish the task completely and safely. All lighting near sensitive species habitat shall be directed away from these areas where feasible.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	During construction, operations, and maintenance
Agriculture and Forestry Resources		No mitigation required.			
Air Quality	Exceedance of Air Emissions and Health Risk Criteria	Mitigation Measure 3.3-2a: Construction Fleet Minimum Requirements and Tracking – Tier 4 Final Emissions Controls: LSPGC shall ensure that at least 75 percent of equipment horsepower hours related to off-road construction equipment include Tier 4 final emissions controls. An initial listing that identifies each off-road unit's certified tier specification to be operated on the Project shall be submitted to the CPUC before the start of construction activities. Construction activities shall not begin until the equipment listing has been submitted to the CPUC. As LSPGC requires new or replacement construction equipment on the Project, LSPGC shall document verification of the certified engine tier before the equipment's use on Project sites. Before the start of construction, LSPGC shall develop a diesel-powered equipment-use hours tracking tool and procedure. The tracking tool shall be utilized by LSPGC to keep track of the certified engine tier and daily equipment use hours of all off-road diesel-powered equipment. If all diesel-powered equipment is Tier 4 final certified, the tracking tool is not required. The tracking tool shall be maintained by LSPGC, and tracking updates shall be submitted to the CPUC on a monthly basis for the duration of construction to track the Project's compliance. The updated tracking tool shall be submitted to the CPUC no later than the tenth day of each month.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Air Quality	Exceedance of Air Emissions and Health Risk Criteria	Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions: LSPGC shall implement the following best management practice, which would reduce fugitive PM10 and PM2.5: All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. The watering regimen may be adjusted during rain events as needed.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Air Quality	Exceedance of Air Emissions and Health Risk Criteria	Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions: LSPGC shall implement the following best management practice, which would reduce fugitive PM10 and PM2.5: All haul trucks transporting soil, sand, or other loose material off-site shall be covered.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Air Quality	Exceedance of Air Emissions and Health Risk Criteria	Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions: LSPGC shall implement the following best management practice, which would reduce fugitive PM10 and PM2.5: All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Air Quality	Exceedance of Air Emissions and Health Risk Criteria	Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions: LSPGC shall implement the following best management practice, which would reduce fugitive PM10 and PM2.5: All vehicle speeds on unpaved roads shall be limited to 15 mph.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Air Quality	Exceedance of Air Emissions and Health Risk Criteria	Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions: LSPGC shall implement the following best management practice, which would reduce fugitive PM10 and PM2.5: All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Air Quality	Exceedance of Air Emissions and Health Risk Criteria	Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions: LSPGC shall implement the following best management practice, which would reduce fugitive PM10 and PM2.5: All excavation, grading, and/or demolition activities in undeveloped or unpaved Project locations shall be suspended when average wind speeds exceed 20 mph.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Air Quality	Exceedance of Air Emissions and Health Risk Criteria	Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions: LSPGC shall implement the following best management practice, which would reduce fugitive PM10 and PM2.5: All trucks and equipment, including their tires, shall be washed off prior to leaving the site in undeveloped or unpaved Project locations.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Air Quality	Exceedance of Air Emissions and Health Risk Criteria	Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions: LSPGC shall implement the following best management practice, which would reduce fugitive PM10 and PM2.5: Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Air Quality	Exceedance of Air Emissions and Health Risk Criteria	Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions: LSPGC shall implement the following best management practice, which would reduce fugitive PM10 and PM2.5: Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Air Quality	Exceedance of Air Emissions and Health Risk Criteria	Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions: LSPGC shall implement the following best management practice, which would reduce fugitive PM10 and PM2.5: All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Air Quality	Exceedance of Air Emissions and Health Risk Criteria	Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions: LSPGC shall implement the following best management practice, which would reduce fugitive PM10 and PM2.5: Post a publicly visible sign with the telephone number and person to contact at the CPUC regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Air Quality	Exceedance of Air Emissions and Health Risk Criteria	Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions: LSPGC shall implement the following best management practice, which would reduce fugitive PM10 and PM2.5: Limit the simultaneous occurrence of excavation, grading, and ground-disturbing construction activities.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Air Quality	Exceedance of Air Emissions and Health Risk Criteria	Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions: LSPGC shall implement the following best management practice, which would reduce fugitive PM10 and PM2.5: Install wind breaks (e.g., trees, fences) on the windward side(s) of actively disturbed areas of staging yards used for the Project. Wind breaks should have a maximum of 50 percent air porosity.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Air Quality	Exceedance of Air Emissions and Health Risk Criteria	Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions: LSPGC shall implement the following best management practice, which would reduce fugitive PM10 and PM2.5: Plant vegetative ground cover (e.g., fast-germinating native grass seed) in disturbed areas as soon as possible, unless specified otherwise by the restoration plan, and watered appropriately until vegetation is established.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Air Quality	Exceedance of Air Emissions and Health Risk Criteria	Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions: LSPGC shall implement the following best management practice, which would reduce fugitive PM10 and PM2.5: Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Air Quality	Exceedance of Air Emissions and Health Risk Criteria	Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions: LSPGC shall implement the following best management practice, which would reduce fugitive PM10 and PM2.5: Minimize the amount of excavated material or waste materials stored at the site.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Air Quality	Exceedance of Air Emissions and Health Risk Criteria	Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions: LSPGC shall implement the following best management practice, which would reduce fugitive PM10 and PM2.5: Hydroseed or apply non-toxic soil stabilizers to construction areas, including previously graded areas, that are inactive for at least 10 calendar days.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	APM BIO-1: Restoration of Disturbed Areas: Once construction is complete in a given area, natural vegetation areas (annual grassland, annual grassland/wetland, riparian, wetland, and vernal pools) that are temporarily disturbed by Project activities shall be restored to approximate preconstruction conditions. Areas that are temporarily disturbed by grading, augering, or equipment movement shall be restored to their original contours and drainage patterns. Work areas shall be decompacted, and salvaged topsoil materials shall be respread following recontouring to aid in restoration of temporary disturbed areas. Revegetation activities shall be conducted in accordance with the Project SWPPP and APMs. Restoration could include recontouring, reseeding, and planting replacement of natural vegetation, as appropriate. Temporarily disturbed natural vegetation areas shall be revegetated with appropriate weed-free native seed mixes or species that are characteristic of the plant community that was disturbed.	LSPGC and its contractors to implement measure as defined.	CPUC mitigation monitor to inspect compliance	During and following construction, and prior to construction close out of the Project
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	APM BIO-2: Rare Plant Surveys: Protocol surveys following standard guidelines shall be conducted within suitable habitat areas for special-status plants that may occur within the Project impact areas during the appropriate blooming period to determine the location and extent of populations of rare plants, if present. In the event of the discovery of a rare plant, the area shall be marked as a sensitive area and shall be avoided to the extent practicable. If avoidance is not possible, LSPGC shall consult with the USFWS for ITP, as required. There are no CDFW-listed species that were analyzed, but CNPS species would require surveys and potential mitigation if they cannot be avoided. Construction activities that may impact rare plants, including movement of construction equipment and other activities outside of the fenced/paved areas within suitable habitat, shall be monitored by a qualified biologist. Upon the discovery of sensitive plants, the qualified biologist shall have the authority to stop work activities and, following the identification and implementation of steps required to avoid or minimize impacts to sensitive plants, direct construction work to commence once more.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	APM BIO-3: Preconstruction Sweeps: Prior to initial vegetation clearance and ground-disturbing activities, a qualified biologist shall conduct preconstruction survey sweeps of the Project work area for special-status wildlife and plants in potentially suitable habitats. In the event of the discovery of a special-status plant, the area shall be marked as a sensitive area and shall be avoided to the extent practicable. If avoidance is not possible, LSPGC shall seek coverage from the Santa Clara Valley HCP, or shall consult with the USFWS and/or CDFW for take ITP or other authorization as well as any additional mitigation. Any other construction activities that may impact sensitive biological resources, including movement of construction equipment and other activities outside of the fenced/paved areas within wildlife habitat, shall be monitored by a qualified biologist. The qualified biologist shall have the authority to stop work activities upon the discovery of sensitive biological resources and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to sensitive resources. These surveys will be conducted within 30 days of the start of construction activities and after protocol surveys for individual species have been conducted. These surveys serve to doublecheck populations, nesting/breeding areas, and sensitive habitats that would be identified during protocol surveys and to ensure that these areas will be avoided by construction activities.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction, during all ground disturbing and vegetation removal activities
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	APM BIO-4: Sensitive Area Demarcation: All sensitive biological areas (including creeks, rivers, wetlands, vernal pools, riparian areas, and special-status species habitats) within the Project work area shall be clearly marked prior to construction commencement to restrict construction activities and equipment from entering these areas, except as necessary for construction activities. These markings shall be inspected regularly to ensure that they remain in place.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	APM BIO-5: Vehicle Cleaning Prior to Entering Natural Areas: Vehicles and equipment shall be cleaned prior to use in native habitat on the Project areas to avoid the spread of noxious weeds and nonnative invasive plant species.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	APM BIO-6: Vehicle Speed Limits: Speed of vehicles driving along proposed access roads and on the Project site during construction and operation shall be limited to 15 mph, except in the case of legal roadgoing vehicles traveling on portions of the Project site that are public roadways, which shall be limited to posted speed limits. In addition, construction and maintenance employees shall be required to stay on established and clearly marked and existing roads, except where not feasible due to physical or safety constraints and shall be advised that care should be exercised when commuting to and from the Project area.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction and operation

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	APM BIO-7: Salt Marsh Harvest Mouse Surveys: Suitable habitat for salt marsh harvest mouse (SMHM) and suitable adjacent areas shall be marked as a sensitive area and shall be avoided to the extent practicable. If avoidance is not possible, USFWS and/or CDFW shall be consulted prior to construction activity. Any other construction activities that may impact SMHM including movement of construction equipment within suitable habitat or suitable adjacent areas would be monitored by a qualified biologist. The qualified biologist shall have the authority to stop work activities upon the discovery of live individuals and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to SMHM, such as allowing individuals to leave on their own or temporarily halting construction in areas where SMHM is present. All adjacent known SMHM preserve areas shall be clearly marked as well and avoided. This APM would be applied along the transmission line west of the proposed alignment in the vicinity of Coyote Creek Lagoon.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	APM BIO-8: Excavation Wildlife Safety Best Management Practices: Excavated holes/trenches that are not within areas that have wildlife exclusion fencing or that are not filled at the end of the workday shall be covered, or a wildlife escape ramp shall be installed to prevent the inadvertent entrapment of wildlife species.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	During construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	APM BIO-9: Worker Environmental Awareness (WEAP) Training: A WEAP shall be developed and implemented to educate all on-site construction workers on site-specific biological and non-biological resources and proper work practices to avoid harming wildlife during construction activities. This WEAP shall include measures to reduce trash buildup during construction.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	During all Project activities
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	APM BIO-10: Outdoor Lighting Measures: The use of outdoor lighting during construction and O&M shall be minimized whenever practicable. All lighting shall be selectively placed, shielded, and directed downward to the extent practicable. All lighting near sensitive species habitat shall be directed away from these areas to the extent practicable. Night work shall be avoided as practicable; however, given the large amount of construction proposed within existing roads, local municipalities may dictate that transmission line construction occurs at nighttime within certain areas of the Project. The most likely areas for nighttime construction are within commercial and industrial areas and not residential or potentially sensitive biological areas. Night work is not anticipated during O&M except during emergencies.	LSPGC and its contractors to implement measure as defined.	CPUC mitigation monitor to inspect compliance	During construction, operation, and maintenance of the Project

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	APM BIO-11: Special-status Bird Surveys: Protocol surveys following standard guidelines shall be conducted for California black rail, tricolored blackbird, California clapper rail, burrowing owl, golden eagle, and bald eagle and focused surveys shall be conducted for western snowy plover, white-tailed kite, and other raptors. In the event of the discovery of suitable habitats, nests, or live individuals, the area and a suitable buffer shall be marked as a sensitive area and shall be avoided to the extent practicable. If avoidance is not possible, USFWS and/or CDFW would be consulted. Tricolored blackbird and burrowing owl are covered species under the Santa Clara Valley HCP; if impacts are identified during species-specific protocol surveys, the take for this species shall be covered either under the HCP or covered under a State ITP in consultation with CDFW. If impacts are identified during species-specific protocol surveys for the other State-listed avian species that are not covered under the Santa Clara Valley HCP (California black rail, California clapper rail, Western snowy plover, bald eagle, and any other avian species that are identified), the take shall be covered under a State ITP in consultation with CDFW. Any other construction activities that may impact special-status birds, including movement of construction equipment and other activities outside of the fenced/paved areas within suitable habitat, shall be monitored by a qualified biologist. Additionally, qualified biologists shall monitor all active nests to ensure that construction activities are not disturbing the nest. The monitor/inspector shall have the authority to stop work activities upon the discovery of nests or live individuals and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to sensitive birds.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	APM BIO-12: Nesting Bird Protection Measures: If feasible, LSPGC shall avoid certain construction activities such as vegetation trimming/removal during the migratory bird nesting or breeding season. When it is not feasible to avoid construction during the nesting or breeding season (generally February 15–August 31), APM BIO-15 shall be used. Any construction activities that may impact nesting birds including movement of construction equipment and other activities outside of the fenced/paved areas within suitable habitat shall be monitored by a qualified biologist. Additionally, biologists shall monitor all active nests to ensure that construction activities are not disturbing the nest. The monitor/inspector shall have the authority to stop work activities upon the discovery of nests or live individuals and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to nesting birds.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	During construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	APM BIO-13: Raptor Surveys: If a raptor nest is observed within 500 feet of the Project during protocol or preconstruction surveys, a qualified biologist shall determine if it is active. If the nest is determined to be active, the qualified biologist shall establish an appropriately sized no construction buffer around the nest and shall monitor the nest to ensure that nesting or breeding activities are not substantially adversely affected. If the biological monitor determines that activities associated with the Project are disturbing or disrupting nesting or breeding activities, the monitor shall make recommendations to reduce noise or disturbance in the vicinity of the nest. If the nest is determined to be inactive, the nest shall be removed under direct supervision of the qualified biologist.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	APM BIO-14: Golden Eagle Protection: The USFWS recommends a one mile no disturbance buffer around active nests during the active nesting season (USFWS 2021). LSPGC shall conduct an eagle nest survey within suitable nesting habitat prior to construction. If preconstruction surveys determine that there is an active golden eagle nest within the Survey Area, LSPGC shall consult with the agencies to identify an appropriate disturbance buffer based on existing conditions, including existing visual barriers, existing noise levels, existing high levels of human activity and vehicle traffic, and other factors. In lieu of placing an avoidance buffer, LSPGC could construct a barrier wall, outside of the nesting season, to obstruct construction activities from line of site from the nest. The barrier would also dampen noise from construction activities. A full-time biological monitor shall monitor the bird(s) for signs of distress. If signs of distress are identified, the biological monitor shall require construction to cease until the birds exhibit normal behavior.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	APM BIO-15: Nesting Bird Surveys: Preconstruction nest surveys shall be conducted during the nesting or breeding season (generally February 15–August 31) within all proposed impact areas and suitable buffers within suitable habitat areas for Migratory Bird Treaty Act (MBTA)-protected birds. This survey shall be performed to determine the presence or absence of nesting birds and roosting bats. If roosting bats or active nests (i.e., containing eggs or young) are identified, a suitable construction avoidance buffer shall be implemented to ensure that the nesting or breeding activities are not affected. If the nesting or breeding activities by a Federal- or State-listed species are observed, LSPGC shall consult with the USFWS and CDFW as necessary. Monitoring of the nest shall continue until the birds have fledged or construction is no longer occurring on the site.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	APM BIO-16: Special-Status Invertebrate Surveys: Protocol surveys following standard guidelines and during appropriate seasons shall be conducted within all proposed impact areas and suitable buffers within potentially suitable habitat areas for vernal pool tadpole shrimp, vernal pool fairy shrimp, monarch butterfly, Western bumblebee, and Crotch's bumblebee. In the event of the discovery of suitable habitat, host plants, or individuals of these special-status invertebrates, the area shall be marked as a sensitive area and shall be avoided to the extent practicable. If impacts are identified during species-specific surveys for vernal pool tadpole shrimp, vernal pool fairy shrimp, monarch butterfly, Western bumblebee, or Crotch's bumblebee which are not covered under the Santa Clara Valley HCP, the take shall be covered under a Federal ITP (vernal pool tadpole shrimp; Federally Endangered, vernal pool fairy shrimp; Federally Threatened, monarch butterfly; Federal candidate species) or State ITP (Western bumblebee and Crotch's bumblebee; State candidate species) in consultation with CDFW or USFWS. Any other construction activities that may impact special-status invertebrates or their habitats, including movement of construction equipment and other activities outside of the fenced/paved areas within suitable habitat, shall be monitored by a qualified biologist. The qualified biologist shall have the authority to stop work activities upon the discovery of individuals or host plants and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to sensitive invertebrates.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	APM BIO-17: Wetland, Vernal Pool, and Waterway Construction Timing Restrictions: Construction in the vicinity of waterways, wetlands, and vernal pools such as along the Cushing Parkway bridge that borders the Don Edwards San Francisco Bay National Wildlife Refuge (NWR), near vernal pools north of the existing PG&E Newark substation, and in the vicinity of Coyote Creek and Guadalupe River shall be restricted to occur during the dry season (generally from May 1st through October 15th) to the maximum extent possible. This would minimize the chance of encountering and impacting sensitive species such as vernal pool tadpole shrimp and California tiger salamander that can be found in annual grassland/wetland, wetland, and vernal pool habitat present in these areas as well as fish species such as steelhead, longfin smelt, and green sturgeon that could be using waterways. If construction cannot be conducted during the dry season in the vicinity of waterways, wetlands, and vernal pools, they would be clearly marked and avoided to the maximum extent possible and biological monitors would be present to ensure that no impacts occur.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	During construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	APM BIO-18: Special-status Amphibian Surveys: Protocol surveys shall be conducted for California tiger salamander and preconstruction surveys shall be conducted within all proposed impact areas and suitable buffers within potentially suitable habitat areas for California tiger salamander. In the event of the discovery of suitable habitats or live individuals, the area and a suitable buffer shall be marked as a sensitive area and shall be avoided to the extent practicable. If avoidance is not possible, USFWS and/or CDFW shall be consulted. California tiger salamander is a covered species under the Santa Clara Valley HCP; if impacts are identified during species-specific surveys, the take for this species shall be covered either under the HCP or covered under a State or Federal ITP in consultation with CDFW and/or USFWS. Any other construction activities that may impact special-status amphibians including movement of construction equipment and other activities outside of the fenced/paved areas within suitable habitat shall be monitored by a qualified biologist. The qualified biologist shall have the authority to stop work activities upon the discovery of live individuals and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to sensitive amphibians.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	APM BIO-19: Wetland and Aquatic Resources Delineations: Pursuant to property owner approval, a wetland and aquatic resources delineation will be conducted on all portions of the proposed Project containing potentially State or Federal jurisdictional waters. Accurate acreages of vernal pools and RWQCB, CDFW, and USACE jurisdictional waters will be defined from these delineations. Vernal pools and jurisdictional waters shall be marked as a sensitive area and shall be avoided to the extent practicable. If these areas cannot be avoided, applicable permits shall be obtained.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	PG&E BMP BIO-1: Burrowing Owl: A survey for evidence of burrowing owl (sign or presence) shall be conducted prior to initial ground disturbance. The survey shall occur within the best detection timeframe and within two weeks of construction. If burrowing owl are detected, consult with the CDFW.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	Prior to and during construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	PG&E BMP BIO-2: Nesting Birds: If work is anticipated to occur within the nesting bird season (February through August), nesting birds, including raptors and other species protected under the MBTA, may be impacted. If active nests are discovered, exclusionary measures and/or designated avoidance buffers may be required and implemented according to the guidance in the PG&E Nesting Bird Management Plan. The Project biologist determines if the construction action will impact the nest, and if so, identifies whether alternative actions or monitoring can be implemented to avoid impacts. If active nests are observed during construction, crews must immediately alert the PG&E Project biologist.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	Prior to and during construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	PG&E FP-1: Worker Training: Hold annual training on HCP requirements for employees and contractors performing covered activities in the Plan Area that are applicable to their job duties and work.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	Prior to and during construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	PG&E FP-2: Park Outside Sensitive Areas: Park vehicles and equipment on pavement, existing roads, or other disturbed or designated areas (barren, gravel, compacted dirt).	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	During construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	PG&E FP-3: Use Existing Access Roads: Use existing access and ROW roads. Minimize the development of new access and ROW roads, including clearing and blading for temporary vehicle access in areas of natural vegetation.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	During construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	PG&E FP-4: Minimize Impacts on Biological Resources: Locate off-road access routes and work sites to minimize impacts on plants, shrubs, trees, small mammal burrows, and unique natural features (e.g., rock outcrops).	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	Prior to and during construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	PG&E FP-6: Inspect Pipes and Culverts for Species: Minimize potential for covered species to seek refuge or shelter in pipes and culverts. Inspect pipes and culverts, with a diameter wide enough to be entered by a covered species that could inhabit the area where pipes are stored, for wildlife species prior to moving pipes and culverts. Immediately contact a biologist if a covered species is suspected or discovered.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	Prior to and during construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	PG&E FP-7: 15 mph Speed Limit: Vehicle speeds on unpaved roads shall not exceed 15 mph.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	During construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	PG&E FP-8: No Fires, Litter, or Pets: Prohibit trash dumping, firearms, open fires (such as barbecues), hunting, and pets (except for safety in remote locations) at work sites.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	During construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	PG&E FP-10: Minimize Activity Footprint and Time Spent at a Work Location: Minimize the activity footprint and minimize the amount of time spent at a work location to reduce the potential for take of species.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	Prior to and during construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	PG&E FP-11: Erosion and Sediment Control BMPs: Utilize standard erosion and sediment control BMPs (pursuant to the most current version of PG&E's Stormwater Field Manual for Construction Best Management Practices) to prevent construction site runoff into waterways.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	Prior to and during construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	PG&E FP-12: Contain and Cover Stockpile Soil: Stockpile soil within established work area boundaries and locate stockpiles so as not to enter water bodies, stormwater inlets, or other standing bodies of water. Cover stockpiled soil prior to precipitation events.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	During construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	PG&E FP-13: Wildlife Ramps. Fit open trenches or steep-walled holes with escape ramps of plywood boards or sloped earthen ramps at each end if left open overnight. Field crews shall search open trenches or steep-walled holes every morning prior to initiating daily activities to ensure wildlife are not trapped. If any wildlife is found, a biologist shall be notified and shall relocate the species to adjacent habitat or the species shall be allowed to naturally disperse, as determined by a biologist.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	During construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	PG&E FP-14: Revegetate with “Weed Free” Seed Mix: If the covered activity disturbs 0.1 acre or more of habitat for a covered species in grasslands, the field crew shall revegetate the area with a commercial “weed free” seed mix.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	During construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	PG&E FP-15: Refueling Buffers: Prohibit vehicular and equipment refueling 250 feet from the edge of vernal pools, and 100 feet from the edge of other wetlands, streams, or waterways. If refueling must be conducted closer to wetlands, construct a secondary containment area subject to review by an environmental field specialist (EFS) and/or biologist. Maintain spill prevention and cleanup equipment in refueling areas.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	During construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	PG&E FP-16: Sensitive Area Buffers: Maintain a buffer of 250 feet from the edge of vernal pools and 50 feet from the edge of wetlands, ponds, or riparian areas. If maintaining the buffer is not possible because the areas are either in or adjacent to facilities, the field crew shall implement other measures as prescribed by the land planner, biologist, or HCP administrator to minimize impacts by flagging access, requiring foot access, restricting work until dry season, or requiring a biological monitor during the activity.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	During construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	Mitigation Measure 3.1-2: Minimize Fugitive Light from Temporary Sources Used for Construction: Described above under Aesthetics.	LSPGC and its contractors to implement measure as defined.	CPUC mitigation monitor to inspect compliance	During construction of the Project

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	Mitigation Measure 3.4-1a: Avoid Impacts to Rare Plants: Rare plant surveys conducted under APM BIO-2 shall be floristic in nature and shall be conducted by a qualified botanist according to procedures outlined in the CDFW publication Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW, 2018b). The survey(s) shall be conducted between April and July in accordance with CDFW protocol and in conjunction with the blooming seasons of those rare plants with moderate potential to occur in the survey area. If no special-status plants are observed during appropriately timed surveys by a qualified botanist, it shall be assumed that the construction activity will have no impact on special-status plants and no further action is required. If special-status plants are identified within the survey area, the individuals or populations shall be mapped and quantified and reported to the CNDDDB and to the City of San José, and the LSPGC project manager shall be notified at least 14 days prior to construction in that area. Impacts on these known occurrences shall be avoided when feasible. LSPGC shall coordinate with CDFW and/or USFWS staff to establish appropriate avoidance and minimization measures, depending on whether the species is federally and/or state listed, and shall consult with CDFW and/or USFWS to obtain an ITP as required for any impacts that cannot be avoided. Avoidance and minimization measures may include, but need not be limited to: (1) No-disturbance buffers. (2) Work windows for low-impact activities that are compatible with the dormant phase of a special-status plant life cycle but that may kill living plants or severely alter their ability to reproduce. (3) Silt fencing or construction fencing to prevent vehicles, equipment, and personnel from accessing the occupied habitat. (4) Erosion control BMPs such as straw wattles made of rice straw, erosion control blankets, or hydroseeding with a native plant seed mix to prevent sedimentation from upslope construction activities. (5) In consultation with and as authorized by CDFW or USFWS, collection and spreading of seeds or relocation of plants to appropriate locations by a qualified botanist.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	Mitigation Measure 3.4-1b: Habitat Restoration and Monitoring: Before construction in areas containing waters of the U.S. and/or state or CDFW-jurisdictional areas, LSPGC shall obtain all required environmental permits, including a Clean Water Act Section 401 water quality certification for federal and state jurisdictional wetlands, Clean Water Act Section 404 permits for federal jurisdictional, and a CDFW Lake and Streambed Alteration Agreement, and shall adhere to the conditions of each. At least 30 days before the scheduled commencement of Project activities in areas containing waters of the U.S. and/or state or CDFW-jurisdictional areas, LSPGC shall submit a Restoration Plan to all applicable permitting agencies (e.g., USACE, RWQCB, CDFW) and the CPUC for review and written approval. No Project activities shall commence until the Restoration Plan is approved in writing by the applicable resource agency or agencies having jurisdiction. The plan shall detail compensatory mitigation for permanent impacts to riparian and wetland habitat in the form of restoration or enhancement of habitat either on-site (where practicable) or off-site as close to the Project site as practicable. The plan shall also describe the on-site restoration of temporary impacts to riparian and wetland habitat. The Restoration Plan shall also include monitoring and success criteria. Impacts to riparian and wetland habitat shall be restored or otherwise mitigated according to the Restoration Plan within the same calendar year as the impact occurs unless otherwise approved in writing by the applicable resource agency or agencies having jurisdiction. More than one plan may be necessary for restoration activities in different locations.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to, during, and following construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	Mitigation Measure 3.4-1b: Habitat Restoration and Monitoring: Restoration and monitoring shall be guided by a qualified biologist experienced in wetland habitat restoration. Restoration shall include protocols for replanting native vegetation removed before or during construction, and management and monitoring of the plants to ensure replanting success. The following measures shall apply to site restoration: (1) Areas affected by construction-related activity shall be replanted or reseeded with locally collected and grown native shrubs and herbaceous species suitable for riparian and wetland locations, under guidance from a qualified restoration biologist. (2) To ensure a successful revegetation effort, all plants shall be monitored and maintained as necessary for a minimum of 5 years. LSPGC shall submit an annual monitoring report to the CPUC and the applicable resource agency or agencies having jurisdiction during each year of revegetation. (3) The revegetation shall be considered successful when, after at least 5 years of monitoring (including at least 3 years without supplemental irrigation), each category of plantings (e.g., herbs, shrubs) has a minimum of 85 percent survival, and restoration areas have attained a relative native cover of 70 percent after 3 years and 75 percent after 5 years, unless approved in writing by the applicable resources agency or agencies having jurisdiction. Survival and cover criteria shall both be required unless the herbaceous or spreading plants cannot be differentiated by individual, in which case the cover success criteria alone may be sufficient if determined in writing by the applicable resources agency or agencies having jurisdiction.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to, during, and following construction
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	Mitigation Measure 3.4-1c: Frac-out Plan: To avoid potential indirect impacts to aquatic resources and associated habitats during horizontal boring or horizontal directional drilling (i.e., trenchless techniques) using pressurized drilling fluids, LSPGC or its contractors shall prepare and submit a Frac-out Plan to the CPUC for preventing and addressing potential inadvertent frac-outs prior to construction at HDD sites. The Frac-out Plan shall specify when a biological monitor will be present during the trenchless technique process, and shall limit work associated with trenchless waterway crossings to daylight hours, unless otherwise authorized by CDFW to allow nighttime work, to enable identification of potential frac-outs and/or potential impacts to sensitive species should a frac-out occur. The Frac-out Plan shall also establish communication protocols and training information for construction personnel, the response materials to be available on site to minimize frac-out effects, and effective responses to potential releases of drilling fluids used during the trenchless technique process. LSPGC's Frac-out Plan shall be submitted to the CPUC 30 days before the start of construction.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	Mitigation Measure 3.4-1d: Protection of Special-Status Wildlife: A qualified biologist shall conduct preconstruction clearance surveys within 7 days prior to the start of construction activities within suitable habitat for special-status species that are known to be present or have a moderate to high potential to occur. In addition to the preconstruction clearance surveys, a qualified biologist shall also be on-site to conduct daily pre-activity surveys and monitoring during all ground-disturbing and vegetation removal activities in suitable habitat for special-status species. The qualified biologist shall conduct daily clearance surveys of all equipment, vehicles, and stockpiled materials at the beginning of each day and regularly throughout the workday, and maintain barriers protecting sensitive habitat areas. The biologist shall ensure that mats are placed for unavoidable equipment passage across sensitive habitats, including vernal pools. If a special-status species is observed in a work area, the qualified biologist shall mark the area for avoidance for the duration of work in the vicinity. If avoidance is not possible, work activities shall cease until the species has left the area on its own, or until other protective action can be taken as authorized by the Santa Clara Valley HCP or a species-specific ITP, in coordination with USFWS and/or CDFW.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources	Sensitive, Protected, and Special-Status Areas and Species	Mitigation Measure 3.4-1e: Construction Worker Environmental Awareness Training Program (WEAP): In addition to the requirements of APM BIO-9, LSPGC shall retain a qualified biologist to conduct pre-construction WEAP training for all personnel entering the Project site. (a) All personnel associated with construction shall attend the WEAP training prior to initiation of construction activities (including, but not limited to, site preparation, staging and mobilization, vegetation clearance/mowing/trimming, grading, and excavation). The training shall include information about the special-status species potentially occurring within the work areas, identification of special-status species and their habitats, a description of the regulatory status and general ecological characteristics of special-status species, and a review of the limits of construction and measures required to avoid and/or minimize impacts to biological resources within the work area. A fact sheet conveying this information and pertinent Project contacts shall also be prepared for distribution to all contractors, their employees, and other personnel involved with construction. (b) Interpretation shall be provided for non-English-speaking workers. (c) The same instructions shall be provided for any new workers prior to entering the work area where sensitive species and/or sensitive species habitats may be present. (d) All employees entering the work areas shall be required to sign a form provided by the qualified biologist(s) documenting they have attended the WEAP and understand the information presented to them. The signed form shall be provided to LSPGC as documentation of training completion. The crew foreman shall be responsible for ensuring crew members adhere to the guidelines and restrictions designed to avoid impacts to special status species and other regulated biological resources. If new personnel are brought onto the work area after completion of the initial WEAP training, the training shall be conducted for all new personnel before they enter the work area where sensitive species and/or their habitats may be present.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	During all Project activities
Biological Resources	Jurisdictional Areas	APM BIO-1, APM BIO-4, APM BIO-19, PG&E FP-1, PG&E FP-14, PG&E FP-15, PG&E FP-16, Mitigation Measure 3.4-1b, and Mitigation Measure 3.4-1d: Restoration of Disturbed Areas: Described above under Sensitive, Protected, and Special-Status Species.	LSPGC and its contractors to implement measure as defined.	CPUC mitigation monitor to inspect compliance	During and following construction, and prior to construction close out of the Project
Biological Resources	Wildlife Corridors and Nesting Sites	APM BIO-1, APM BIO-4, APM BIO-6, APM BIO-9, APM BIO-10, APM BIO-17, PG&E BMP BIO-2:, PG&E FP-1, PG&E FP-2, PG&E FP-3, PG&E FP-4, PG&E FP-6, PG&E FP-10, PG&E FP-11, PG&E FP-12, PG&E FP-14, PG&E FP-15, PG&E FP-16, Mitigation Measure 3.1-2, Mitigation Measures 3.4-1b through 3.4-1e: Described above under Sensitive, Protected, and Special-Status Species.			

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources	Tree Removal	Mitigation Measure 3.4-5: Compliance with Local Tree Ordinances: All removal of street trees within the cities of Fremont, Milpitas, San José, and Santa Clara shall be coordinated with the responsible department in each city (see Section 3.4.3, Regulatory Setting) regarding any ministerial tree removal permits. LSPGC shall make a good-faith effort to comply with all requirements including tree replanting and monitoring to help ensure successful replanting.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction
Biological Resources	HCPs, NCCPs, Other Approved Habitat Conservation Plans	PG&E FP-9: Described below under Wildfire.			
Biological Resources	HCPs, NCCPs, Other Approved Habitat Conservation Plans	PG&E BMP BIO-2, PG&E FP-1, PG&E FP-2, PG&E FP-3, PG&E FP-4, PG&E FP-5, PG&E FP-6, PG&E FP-7, PG&E FP-8, PG&E FP-10, PG&E FP-11, PG&E FP-12, PG&E FP-14, PG&E FP-15, PG&E FP-16: Described above under Sensitive, Protected, and Special-Status Species.			
Biological Resources	Bird and Bat Electrocution and/or Collision Risk	APM BIO-9, PG&E BMP BIO-2, PG&E FP-1, and Mitigation Measure 3.4-1e: Described above under Sensitive, Protected, and Special-Status Species.			

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Cultural Resources		APM CUL-1: Worker Environmental Awareness Program (WEAP) Training: LSPGC shall obtain a qualified archaeologist to design the cultural resources component of a WEAP that shall be provided to all Project personnel who may encounter and/or alter historical resources or unique archaeological properties, including construction supervisors and field personnel. The WEAP shall be submitted to the CPUC prior to construction. No construction worker shall be involved in ground-disturbing activities without having participated in the WEAP. The WEAP shall include, at a minimum: (a) Training on how to identify potential cultural resources and human remains during the construction process. (b) A review of applicable local, state, and federal ordinances, laws, and regulations pertaining to historic preservation. (c) A discussion of procedures to be followed in the event that unanticipated cultural resources are discovered during implementation of the Project. (d) A discussion of disciplinary and other actions that could be taken against persons violating historic preservation laws and LSPGC policies. (e) A statement by the construction company or applicable employer agreeing to abide by the WEAP, LSPGC policies, and other applicable laws and regulations. The WEAP may be conducted in concert with other environmental or safety awareness and education programs for the Project, provided that the program elements pertaining to cultural resources are designed by a qualified archaeologist, which is defined as an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archaeology (36 CFR Part 61).	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to and during all Project activities

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Cultural Resources		APM CUL-2: Archaeological and Native American Monitoring: Archaeological and Native American monitoring shall be conducted during initial ground disturbance associated with the Project when within 100 feet (30 m) of previously recorded prehistoric or ethnohistoric resources, or after unanticipated discovery of same. Archaeological monitoring shall be conducted during ground disturbance associated with the Project when within 100 feet (30 m) of previously recorded historic-period resources, or after unanticipated discovery of same. Prehistoric and/or ethnohistoric archaeological sites have been recorded adjacent to the Project area, and the Sacred Lands File (SLF) search and Tribal outreach indicate that lands sacred to the North Valley Yokuts Tribe and the Ohlone Indian Tribe are present within the Project search area. In addition, historic-era archaeological sites have been recorded within 100 feet (30 m) of the Project area. A qualified archaeologist, or an archaeological monitor under the supervision of a qualified archaeologist, shall be retained by LSPGC to monitor excavation in each work area for the Project in accordance with the above monitoring criteria to ensure that there is no impact to any significant unanticipated historical resource. A qualified archaeologist, and a Native American monitor, if determined during Tribal consultation, shall be retained by LSPGC to monitor excavation in each work area for the Project in accordance with the above monitoring criteria to ensure that there is no impact to any significant unanticipated cultural resource. Procedures to be followed in the event that a Native American monitor is not available shall be determined during Tribal consultation. Native American monitoring requirements established in this APM may be superseded by government-to-government consultation conducted between the CPUC and Tribal organizations as part of the Assembly Bill 52 process or otherwise.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to confirm compliance	During construction
Cultural Resources		APM CUL-3: Unanticipated Discovery of Potentially Significant Prehistoric and Historic Resources: In the event that previously unidentified cultural resources are uncovered during implementation of the Project, all work within 100 feet (30 m) of the discovery shall be halted and redirected to another location. LSPGC's qualified archaeologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts shall occur, the resource shall be documented on State of California Department of Parks and Recreation (DPR) cultural resource records, and no further effort shall be required. If the resource cannot be avoided and may be subject to further impact, LSPGC's qualified archaeologist shall evaluate the significance and California Register of Historic Resources (CRHR) eligibility of the resources and, in consultation with the CPUC, determine appropriate treatment measures. Preservation in place shall be the preferred means to avoid impacts to significant historical resources. Consistent with CEQA Section 15126.4(b)(3), if it is demonstrated that resources cannot feasibly be avoided, LSPGC's qualified archaeologist, in consultation with the CPUC and, if the unearthed resource is prehistoric or Native American in nature, the Native American monitor shall develop additional treatment measures, such as data recovery consistent with CEQA Guidelines 15126.4(b)(3)(C)-(D). Archaeological materials recovered during any investigation shall be curated at an accredited curation facility or transferred to the appropriate Tribal organization.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	During all Project activities

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Cultural Resources		APM CUL-4: Cultural Resources Inventory: The limits of construction for the proposed Newark to NRS transmission line within Caltrans ROW, and temporary construction Staging Areas 1, 4 through 8, 10, and part of 11, shall be surveyed prior to construction. If additional proposed facilities and ground-disturbing activities move outside the previously surveyed acreage, the new areas shall be subjected to a cultural resources inventory to ensure that any newly identified cultural resources are either avoided by project redesign or evaluated and treated.	LSPGC and its contractors to implement measure as defined	CPUC to review and approve AMP. CPUC mitigation monitor to confirm compliance	During construction
Cultural Resources		APM CUL-5: Unanticipated Discovery of Human Remains: Avoidance and protection of inadvertent discoveries that contain human remains shall be the preferred protection strategy where feasible and otherwise managed pursuant to the standards of CEQA Guidelines 15064.5(d) and (e). If human remains are discovered during construction or O&M activities, all work shall be diverted from the area of the discovery and the CPUC shall be informed immediately. LSPGC's qualified archaeologist shall contact the appropriate County Coroner to determine whether or not the remains are Native American. If the remains are determined to be Native American, the Coroner shall contact the Native American Heritage Commission (NAHC). The NAHC shall then identify the person or persons it believes to be the most likely descendant of the deceased Native American, who in turn shall make recommendations for the appropriate means of treating the human remains and any associated funerary objects. No part of the Project is located on federal land and no federal monies are involved; therefore, the Project is not subject to the Native American Graves Protection and Repatriation Act (NAGPRA) of 1990.	LSPGC and its contractors to implement measure as defined	CPUC to review and approve AMP. CPUC mitigation monitor to confirm compliance	During all Project activities
Cultural Resources		PG&E BMP CULT-1: Worker Awareness Training: PG&E will provide environmental awareness training on archeological cultural and paleontological resources protection. This training may be administered by the PG&E cultural resources specialist (CRS) or a designee as a stand-alone training or included as part of the overall environmental awareness training as required by the project and will at minimum include: types of cultural resources or fossils that could occur at the project site; types of soils or lithologies in which the cultural resources or fossils could be preserved; procedures that should be followed in the event of a cultural resource, human remain, or fossil discovery; and penalties for disturbing cultural or paleontological resources.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	Prior to and during construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Cultural Resources		PG&E BMP CULT-2: Inadvertent Discovery: If any new cultural resources are encountered during Project activities, all work must be suspended in the vicinity (approximately 100 feet) of the resource, and the cultural resource specialist (CRS) shall be immediately notified. At that time, the CRS shall coordinate any necessary investigations of the site with appropriate specialists, as needed. PG&E may be required to implement protective measures deemed necessary for the protection of the cultural resources. Prehistoric resources that may be identified during Project implementation may include, but are not limited to, stone tools and manufacturing debris made of obsidian, basalt, and other lithic materials; milling equipment such as bedrock mortars, portable mortars, and pestles; and locally darkened soils (midden) that may contain dietary remains such as shell and bone, as well as human remains. Historic resources that may be identified include, but are not limited to, small cemeteries or burial plots, structural foundations, cabin pads, cans with soldered seams or tops, bottles or fragments of clear and colored glass, cut (square) nails, and ceramics.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	During construction
Cultural Resources		PG&E BMP CULT-3: Human Remains: In keeping with the provisions provided in 7050.5 of the CHSC and Public Resource Code 5097.98, if human remains are encountered (or are suspected) during any project-related activity, PG&E shall: (a) Stop all work within 100 ft. (b) Immediately contact: CRS, who will then notify the county coroner. (c) Secure location, but do not touch or remove remains and associated artifacts. (d) Do not remove associated spoils or pick through them. (e) Record the location and keep notes of all calls and events. (f) Treat the find as confidential and do not publicly disclose the location. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission within 24 hours of such identification. The most likely descendant shall work with the CRS to develop a program for re-interment or other disposition of the human remains and any associated artifacts. No additional work shall take place within the immediate vicinity of the find until the appropriate actions have been implemented.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	During construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Cultural Resources		Mitigation Measure 3.5-1: Archaeological Monitoring Plan: Prior to authorization to proceed, a Secretary of the Interior-qualified archaeologist shall prepare an archaeological monitoring plan. The plan shall be reviewed by the culturally-affiliated Native American Tribe(s) and the CPUC. The plan will include (but not be limited to) the following components: (a) Training program for all construction and field workers involved in site disturbance. On-site personnel shall attend a mandatory pre-project training led by a Secretary of the Interior-qualified archaeologist and a Native American representative. The training will outline the general cultural sensitivity of the area and the procedures to follow in the event that cultural materials and/or human remains are inadvertently discovered. (b) Detailed explanation of where monitoring will be completed and under what circumstances based on soil types, geology, distance to known sites, and other factors (c) Person(s) responsible for conducting archaeological monitoring activities, including a request to the culturally affiliated Native American Tribe(s) for a tribal monitor. (d) Identification of the lead Secretary of the Interior-qualified archaeologist responsible for overseeing and directing the monitors. (e) How the monitoring will be conducted and the required format and content of monitoring reports. (f) Schedule for submittal of monitoring reports and person(s) responsible for review and approval of monitoring reports. (g) Schedule for submittal of monitoring reports and person(s) responsible for review and approval of monitoring reports. (h) Methods to ensure security of cultural resources. (i) Protocol for notifying local authorities (i.e., Sheriff, Police) should site looting and other illegal activities occur during construction.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to any Project-related ground disturbing activities and during construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Cultural Resources		Mitigation Measure 3.5-1: Archaeological Monitoring Plan: During the course of the monitoring, the lead Secretary of the Interior-qualified archaeologist and lead tribal representative or lead tribal monitor may adjust the frequency of the monitoring from continuous to intermittent or vice versa based on the conditions and professional judgment regarding the potential to impact resources. If cultural materials are encountered, all soil-disturbing activities within 100 feet in all directions of the find shall cease until the resource is evaluated and the CPUC project manager concurs with the evaluation. The archaeological monitor shall immediately notify the lead Secretary of the Interior-qualified archaeologist, the CPUC, and its consultant of the encountered resource(s). After making a reasonable effort to assess the identity, integrity, and significance of the encountered resource, in consultation with the culturally affiliated Native American Tribe(s), the lead Secretary of the Interior-qualified archaeologist shall present the findings of this assessment to the CPUC for review no later than 10 calendar days after the find. If it is not possible to present the findings within 10 calendar days, the lead Secretary of the Interior-qualified archaeologist shall explain why doing so is infeasible and when it will be possible to present the findings. If the find is determined to be potentially significant by the CPUC, the lead Secretary of the Interior-qualified archaeologist, in consultation with the CPUC and the culturally affiliated Native American Tribe(s), shall determine whether preservation in place is feasible. Consistent with CEQA Guidelines Section 15126.4(b)(3), this may be accomplished through planning construction to avoid the resource; incorporating the resource within open space; capping and covering the resource; or deeding the site into a permanent conservation easement. If avoidance is not feasible, the CPUC shall consult with the culturally affiliated Native American Tribe(s) and other appropriate interested parties to determine treatment measures to avoid, minimize, or mitigate any potential impacts to the resource pursuant to PRC [Public Resources Code] Section 21083.2, and CEQA Guidelines Section 15126.4. This shall include documentation of the resource and may include data recovery (according to PRC Section 21083.2), if deemed appropriate, or other actions such as treating the resource with culturally appropriate dignity and protecting the cultural character and integrity of the resource (according to PRC Section 21084.3).	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to any Project-related ground disturbing activities and during construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Cultural Resources		Mitigation Measure 3.5-2: Unanticipated Discovery of Submerged Cultural Resources: If an unanticipated discovery of cultural resources occurs on land under the jurisdiction of the California State Lands Commission (CSLC), the following protocols will be followed. (a) LSPGC shall immediately notify the CPUC of the discovery and the CPUC shall initiate consultation with CSLC staff within 2 business days of the discovery. (b) Per Public Resources Code Section 6313(c), any submerged cultural resource remaining in State waters for more than 50 years is presumed to be archaeologically or historically significant. (c) The qualified archaeologist assessing the find shall have expertise in maritime archaeology if the find is a maritime archaeological resource. (d) The CPUC shall consult with the CSLC regarding assessment of the find and development of any treatment measures to minimize or mitigate potential impacts on the resource, pursuant to Public Resources Code Section 21083.2 and CEQA Guidelines Section 15126.4. (e) The CPUC shall submit to the CSLC any report prepared for the resource as part of the assessment of the find and implementation of treatment measures to minimize or mitigate potential impacts.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	During construction
Energy	Energy Consumption	PG&E BMP AQ-1: Vehicle Idling: A vehicle operator is prohibited from idling an on-road diesel-fueled vehicle with a Gross Vehicle Weight of $\geq 10,001$ pounds (lbs), or an off-road diesel-fueled vehicle with a primary engine ≥ 25 horsepower (hp), in excess of five minutes unless conducting one or more of the following activities: (a) Doing work for which the vehicle was intended. (b) Powering equipment necessary to perform a job function. (c) Operating lights or signals to direct traffic at a PG&E job site. (d) Service, testing or maintenance on the vehicle. (e) Regenerating an exhaust filter. (f) Idling for safety reasons, including providing light when working after dark, defrosting windows, keeping the cabin warm to avoid a health hazard, and providing air conditioning to avoid heat illness. (g) Idling due to traffic conditions beyond the vehicle operator's control; (h) Warming an engine up to operating temperatures, as specified by the equipment manufacturer. Queuing, such as when a line of off-road trucks forms to receive materials from an excavator. Queuing does not include a vehicle waiting for another vehicle to perform a task. Idling while queuing is not allowed within 100 feet of a residential home.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	During construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Geology, Soils, Seismicity, and Paleontological Resources	Ground Failure, Slope Instability, and Landslides	APM GEO-1: Geotechnical Studies and Geologic Hazard Reduction Measures: The following measures shall be implemented during construction to minimize impacts from geological hazards and disturbance to soils: (a) Keep vehicle and construction equipment within the limits of the Project and in approved construction work areas to reduce disturbance to topsoil. (b) Geotechnical studies shall be completed to evaluate the risk of geologic hazards associated with the Project. The geotechnical studies shall provide geotechnical engineering recommendations relative to subsurface soil and rock conditions, groundwater conditions, lateral earth pressures, and seismic classifications of the Project area. Recommendations from the geotechnical studies shall be considered in the final design. (c) Avoid construction in areas with saturated soils, whenever practical, to reduce impacts to soil structure and allow safe access. Similarly, avoid topsoil salvage in saturated soils to maintain soil structure. (d) Keep topsoil material on-site in the immediate vicinity of the temporary disturbance or at a nearby approved work area to be used in restoration of temporary disturbed areas. Temporary disturbance areas shall be re-contoured following construction to match pre-construction grades. Areas shall be allowed to re-vegetate naturally or be reseeded with a native seed mix from a local source if necessary. On-site material storage shall be sited and managed in accordance with all required permits and approvals. (e) Keep vegetation removal and soil disturbance to a minimum and limited to only the areas needed for construction. Removed vegetation shall be disposed of off-site to an appropriate licensed facility or can be chipped on-site to be used as mulch during restoration.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to any Project-related ground disturbing activities and during construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Geology, Soils, Seismicity, and Paleontological Resources	Paleontological Finds	APM PALEO-1: Paleontological Mitigation Monitoring Plan (PRMMP): Prior to the issuance of grading permits, a qualified paleontologist shall be retained to prepare and oversee the PRMMP for the Project. The PRMMP shall contain monitoring procedures, define areas and types of earthwork to be monitored, and provide methods for determining the significance of fossil discoveries. The PRMMP shall direct that a qualified paleontological monitor (working under the supervision of the qualified paleontologist) shall monitor all excavations or grading at depths exceeding seven feet bgs where potentially fossil-bearing alluvial deposits of Pleistocene age may be present. The duration and timing of paleontological monitoring shall be determined by the qualified paleontologist based on the grading plans and construction schedule and may be modified based on the initial results of monitoring. The PRMMP shall state that any fossils that are collected shall be prepared to the point of curation, identified to the lowest reasonable taxonomic level, and curated into a recognized professional repository (e.g., San Diego Natural History Museum [SDNHM], University of California Museum of Paleontology [UCMP]), along with associated field notes, photographs, and compiled fossil locality data. The repository shall be contracted prior to the start of earthwork to curate and store any discovered and recovered fossils. Such an institution shall be a recognized paleontological specimen repository with a permanent curator, such as a museum or university. Donation of the fossils shall be accompanied by financial support for initial specimen curation and storage. Following the completion of the above tasks, the qualified paleontologist shall prepare a final mitigation report that outlines the results of the mitigation program. This report shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils. The report shall be submitted to appropriate agencies, as well as to the designated repository.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to any Project-related ground disturbing activities and during construction
Geology, Soils, Seismicity, and Paleontological Resources	Paleontological Finds	APM PALEO-2: Paleontological Resources Findings: If paleontological resources are encountered during ground disturbing activities when the qualified paleontologist or paleontological monitor is not on-site (an inadvertent discovery), earthwork within the vicinity of the discovery shall immediately halt, and the qualified paleontologist shall evaluate the significance of the fossil discovery. If the fossil discovery is deemed significant, the fossil shall be recovered using appropriate recovery techniques based on the type, size, and mode of preservation of the unearthed fossil. Earthwork may resume in the area of the fossil discovery once the fossil has been recovered and the qualified paleontologist deems the discovery site has been mitigated to the extent necessary.	LSPGC and its contractors to implement measure as defined	LSPGC qualified paleontologist to inspect compliance. CPUC mitigation monitor to confirm compliance	During construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Geology, Soils, Seismicity, and Paleontological Resources	Paleontological Finds	PG&E BMP PALEO-1: Unanticipated Paleontological Discoveries: If significant paleontological resources are discovered during construction activities, work will stop within 50 feet and the PG&E CRS will be contacted immediately. The CRS will work with the qualified paleontologist to evaluate the discovery. If the discovery is determined to be significant, PG&E will implement measures to protect and document the paleontological resource. Work may not resume within 50 feet of the find until approval by the CRS in coordination with the paleontologist. In the event that significant paleontological resources are encountered during the project, protection and recovery (if feasible and safe) of those resources may be required. Treatment and curation of fossils will be conducted in consultation with the landowner, PG&E, and CPUC. The paleontologist will be responsible for developing the recovery strategy and will lead the recovery effort, which will include establishing recovery standards, preparing specimens for identification and preservation, documentation and reporting, and securing a curation agreement from the approved facility.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	During construction
Greenhouse Gas Emissions	GHG Emissions	PG&E BMP AQ-1: Described above under Energy.			
Hazards and Hazardous Materials	Construction Hazards	APM HAZ-1: Site-Specific Spill Prevention, Control, and Countermeasure Plan: A site-specific SPCCP shall be prepared prior to the initiation of storage of hazardous liquids on the Project site in excess of the appropriate regulatory thresholds. In the event of an accidental spill, the Project shall be equipped with secondary containment that meets SPCCP guidelines. The secondary containment shall be sufficiently sized to accommodate accidental spills. The plan shall be provided to the CPUC prior to construction for recordkeeping.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to and during construction
Hazards and Hazardous Materials	Construction Hazards	PG&E BMP HAZ-7: Spill Prevention, Control, and Countermeasure (SPCC) Plan: The local/support EFS shall be notified 30 days prior to an SPCC-triggering event occurs. Events that trigger an SPCCP include: (a) New storage of oil at a facility causing the total oil storage to exceed 1,320 gallons. (b) Modification to existing oil storage at a facility that contains >1,320 gallons of oil by addition or removal of oil containers >55 gallons. If the oil volume is contained in anything greater than 55 gallons, the SPCC Plan must be certified by a licensed engineer. SPCC containment must be installed prior to moving on-site of oil quantities requiring containment. The PM number must remain open until the local/support EFS notifies the team that the plan is certified by an engineer, and any necessary modifications are complete.	PG&E and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to and during construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Hazards and Hazardous Materials	Construction Hazards	Mitigation Measure 3.9-1a: Pre-Construction Hazardous Materials Assessment: Prior to the preparation of the Health and Safety Plan and Soils and Groundwater Management Plan for the Project, LSPGC or its contractor(s) shall perform a limited soil and groundwater investigation at proposed construction work areas that overlap with the Cisco Systems 6/Syntax Court Disposal Site and South Bay Asbestos Superfund Site to characterize soil and groundwater quality prior to construction. Samples shall be collected from each of the proposed work areas that will be disturbed during project construction, and these samples shall be collected to the depth of the planned excavation. Subsurface soil samples shall be analyzed for total petroleum hydrocarbons (TPH) (e.g., gasoline, diesel, and waste oil), Title 22 metals, volatile organic compounds (VOCs), and polychlorinated biphenyls (PCBs) to evaluate the potential presence of contamination. Groundwater samples shall be collected if subsurface excavations are anticipated to require dewatering. Additional analyses for VOCs and semi-volatile organic compounds (SVOCs) shall be conducted for groundwater samples collected at construction locations within 1,000 feet of adjacent landfills. In the event the assessment identifies hazardous materials issues, the results of the hazardous materials assessment shall be incorporated into the Site Health and Safety Plan prepared in accordance with Mitigation Measure 3.9-1b and the Soil and Groundwater Management Plan prepared in accordance with Mitigation Measure 3.9-1c to determine whether specific soil and groundwater management and disposal procedures for contaminated materials are required, whether excavated soils are suitable for reuse, and whether construction worker health and safety procedures for working with contaminated materials are required. In the event the assessment does not identify hazardous materials issues, LSPGC shall implement APM WQ-1. LSPGC shall compile the results of these assessments and analyses into a Pre-Construction Hazardous Materials Assessment, and shall submit this Pre-Construction Hazardous Materials Assessment to the CPUC no less than 60 days before the start of construction within the affected areas.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	At least 60 days prior to, and during, construction
Hazards and Hazardous Materials	Construction Hazards	Mitigation Measure 3.9-1b: Health and Safety Plan: LSPGC or its contractor(s) shall retain a qualified environmental professional to prepare a site-specific Health and Safety Plan (HASP) in accordance with federal OSHA regulations (29 CFR 1910.120) and Cal/OSHA regulations (8 California Code of Regulations Title 8, Section 5192). Because anticipated contaminants vary depending upon the location of proposed improvements in the Project area and may vary over time, the HASP shall address site-specific worker health and safety issues during construction.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	At least 30 days prior to, and during, construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Hazards and Hazardous Materials	Construction Hazards	Mitigation Measure 3.9-1b: Health and Safety Plan: The HASP shall include the following information: (a) Results of sampling conducted in accordance with Mitigation Measure 3.9-1a. (b) All required measures to protect construction workers and the general public by including engineering controls, monitoring, and security measures to prevent unauthorized entry to the construction areas and to reduce hazards outside of the construction areas. If prescribed contaminant exposure levels are exceeded, personal protective equipment shall be required for workers in accordance with state and federal regulations. (c) Required worker health and safety provisions for all workers potentially exposed to contaminated materials, in accordance with state and federal worker safety regulations, and designated qualified individual personnel responsible for implementation of the HASP. (d) The contractor shall have a site health and safety supervisor fully trained pursuant to hazardous materials regulations be present during excavation, trenching, or cut and fill operations to monitor for evidence of potential soil contamination, including soil staining, noxious odors, debris or buried storage containers. The site health and safety supervisor must be capable of evaluating whether hazardous materials encountered constitute an incidental release of a hazardous substance or an emergency spill. The site health and safety supervisor shall implement procedures to be followed in the event of an unanticipated hazardous materials release that may impact health and safety. These procedures shall be in accordance with hazardous waste operations and regulations and shall specifically include, but need not be limited to: 1) immediately stopping work in the vicinity of the unknown hazardous materials release; 2) notifying Santa Clara County Department of Health, Regional Water Quality Control Board, or Department of Toxic Substances Control; and 3) retaining a qualified environmental firm to perform sampling, remediation, and/or disposal. (e) Documentation of HASP measures that shall be implemented during the Project's construction. (f) Provision that submittal of the HASP to LSPGC, or any review of the contractor's HASP by LSPGC, shall not be construed as approval of the adequacy of the contractor as a health and safety professional, the contractor's HASP, or any safety measure taken in or near the construction site. The contractor shall be solely and fully responsible for compliance with all laws, rules, and regulations applicable to health and safety during the performance of the construction work. LSPGC shall submit the Health and Safety Plan to the CPUC 30 days before the start of construction, or upon receipt of the results of the Pre-Construction Hazardous Materials Assessment (whichever comes	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	At least 30 days prior to, and during, construction
Hazards and Hazardous Materials	Construction Hazards	Mitigation Measure 3.17-2a: Described below in Transportation.			

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Hazards and Hazardous Materials	Waste Management	APM HAZ-2: Hazardous Materials Management Plan: A HMMP shall be prepared and implemented for the Project. The plan shall be prepared in accordance with relevant state and federal guidelines and regulations (e.g., Cal/OSHA). The plan shall include the following information related to hazardous materials and waste, as applicable: (a) A list of hazardous materials present on-site during construction and O&M to be updated as needed, along with product Safety Data Sheets and other information regarding storage, application, transportation, and disposal requirements. (b) A Hazardous Materials Communication (i.e., "HAZCOM") Plan. (c) Assignments and responsibilities of Project health and safety roles. (d) Standards for any secondary containment and countermeasures required for hazardous materials. (e) Spill response procedures based on product and quantity. The procedures shall include materials to be used, location of such materials within the Project area, and disposal protocols. (f) Protocols for the management, testing, reporting, and disposal of potentially contaminated soils or groundwater observed or discovered during construction. This would include termination of work within the area of suspected contamination sampling by an OSHA-trained individual and testing at a certified laboratory. The plan shall be provided to the CPUC prior to construction for recordkeeping. Plan updates shall be made and submitted as needed if construction activities change such that the existing plan does not adequately address the Project.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to and during construction activities
Hazards and Hazardous Materials	Waste Management	PG&E BMP HAZ-2: Hazardous Materials Business Plan (HMBP): The EFS shall be notified 30 days prior to a threshold exceeding hazardous material/waste being placed on-site. Threshold limits are 200 cubic feet of compressed gases (1,000 cubic feet for simple asphyxiation or the release of pressure only; carbon dioxide), 500 lbs of solids, or 55 gallons of liquids for more than 30 non-consecutive days. If required, the local county or city shall be notified of any amount of hazardous material/waste: (a) Counties: Nevada, San Bernardino (waste only), San Francisco, Santa Clara (call for city specific details), Santa Cruz, Yuba (waste only) (b) Cities: Bakersfield (waste only), Berkeley, Healdsburg, Sebastopol, Petaluma, Santa Clara (call for city specific details) PG&E shall develop an HMBP as necessary.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	During construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Hazards and Hazardous Materials	Waste Management	PG&E BMP HAZ-3: Hazardous Waste Management: This Project may involve the storage of hazardous materials, and they must be managed according to regulations and the following BMPs. (a) All releases of hazardous materials must be immediately addressed. Maintain a spill kit on-site during the length of the Project. Contact the Project EFS for spills of hazardous materials/wastes to determine if agency notifications shall be required and/or if additional resources are needed. (b) Hazardous materials, greater than 440 lbs and less than 1,001 lbs can be transported on PG&E vehicles if the proper materials of trade (MOT) shipping paper/Material Safety Data Sheet (MSDS) accompanies the load. Contact the Project EFS for additional guidance in these areas. (c) All hazardous materials containers must be marked correctly. (d) All hazardous materials signs must be displayed as required. (e) Non-saturated oily rags (to be laundered) stored in non-combustible containers. (f) Emergency equipment such as fire extinguisher, eye wash, MSDS, etc. must be available on-site. (g) Hazardous material containers must be in good condition. (h) All hazardous materials must be compatible with containers. (i) Hazardous materials containers are kept closed. (j) If there is an unauthorized release of hazardous material, contact your EFS immediately. For after-hours releases contact the Environmental Emergency Hotline at 1-800-874-4043.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	During construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Hazards and Hazardous Materials	Waste Management	PG&E BMP HAZ-3: Hazardous Waste Management: Immediately contact the local PG&E EFS and stop work if any of the following conditions occur. After hours or if the local EFS is unavailable, please call the Environmental Hotline at 800-874-4043. (a) Discharge or spill of hazardous substance. (b) If an Environmental Regulator visits the site. (c) Visually cloudy/muddy water is observed leaving the work area. (d) An underground storage tank is discovered. (e) A subsurface component related to site remediation activities (e.g., monitoring well, recovery well, injection well) is discovered. No subsurface components may be impacted. (f) If during excavation unanticipated evidence of contamination is identified (e.g., staining, odors), work must cease and when safe to do so, cover the trench with steel plates. In order to minimize impacts to public safety and the environment, place contaminated soil on a polyethylene sheet (four milliliters) and cover or place the contaminated soil in lined covered containers. Then contact your local/support EFS to determine the next steps. If any subsurface components related to site remediation activities (e.g., monitoring well, recovery well, injection well) are discovered in the path of excavation, work must cease in that location and your EFS must be notified to determine the next steps. No subsurface components may be impacted.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	During construction
Hazards and Hazardous Materials	Soil Excavation and Dewatering	APM HAZ-3: Compliance with the Covenant to Restrict Use of Property: Construction activities within the Cisco Systems Site 6/Syntax Court Disposal Site boundaries (as outlined in Figure 5.9-1, Contaminated Sites Map) shall comply with the Covenant to Restrict Use of Property and Environmental Restriction, signed May 23, 2003. Specific activities could include: a) Providing written notice to the Department of Toxic Substances Control (DTSC) at least 14 days prior to ground disturbing construction activities with the location of excavation, proposed depth, and soil management procedures. b) Conducting construction activities in accordance with the SMP and the Health and Safety Plan (2001 and 2015 update). c) Handling excavated soils in accordance with all applicable local, state, and federal regulations.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	Prior to and during construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Hazards and Hazardous Materials	Soil Excavation and Dewatering	APM HAZ-4: Compliance with the Covenant and Agreement for Environmental Restriction: Construction activities within the South Bay Asbestos Area site boundaries shall comply with the Covenant and Agreement for Environmental Restriction, signed October 21, 2004, by the property owner and the DTSC. Specific activities would include, but not necessarily be limited to, the following: a) Coordinating with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Lead Agency and gaining written approval for ground disturbing activities that could affect the soil cap. b) Preparing a SMP for any soils contaminated with asbestos or asbestos containing materials brought to the surface by grading, excavation, trenching, or backfilling.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to inspect compliance	Prior to and during construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Hazards and Hazardous Materials	Soil Excavation and Dewatering	Mitigation Measure 3.9-1c: Soil and Groundwater Management Plan: LSPGC or its contractor(s) shall direct the construction contractor to prepare and implement a Soil and Groundwater Management Plan, subject to review by the CPUC and the San Francisco Bay Regional Water Quality Control Board, as well as the Alameda County Water District (for activities within its service area), that specifies the method for handling and disposal of contaminated soil and groundwater prior to construction. The plan shall include all necessary procedures to ensure that excavated materials and fluids generated during construction are stored, managed, and disposed of in a manner that is protective of human health and in accordance with applicable laws and regulations. The plan shall include the following information. (a) Step-by-step procedures for evaluation, handling, stockpiling, storage, testing, and disposal of excavated material, including criteria for reuse and offsite disposal. All excavated materials shall be inspected prior to initial stockpiling, and spoils that are visibly stained and/or have a noticeable odor shall be stockpiled separately to minimize the amount of material that may require special handling. In addition, excavated materials shall be inspected for buried building materials, debris, and evidence of underground storage tanks; if identified, these materials shall be stockpiled separately and characterized in accordance with landfill disposal requirements. If some of the spoils do not meet the reuse criteria and/or debris is identified, these materials shall be disposed of at a permitted landfill facility. (b) Procedures to be implemented if unknown subsurface conditions or contamination are encountered, such as previously unreported tanks, wells, or contaminated soils. (c) Procedures for containment, handling, and disposal of groundwater generated from construction dewatering, including the method(s) used to analyze groundwater for hazardous materials likely to be encountered at specific locations (based on the results of Mitigation Measure 3.9-1a), and the appropriate treatment and/or disposal methods. This would include describing procedures to prevent preferential runoff pathways or the cross-connection of aquifers during the drilling for the tower piers. LSPGC shall submit the Soil and Groundwater Management Plan to the CPUC 30 days before the start of construction, or upon the receipt of the results of the Pre-Construction Hazardous Materials Assessment (whichever comes first).	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	At least 30 days prior to, and during, construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Hydrology and Water Quality	Dewatering	APM WQ-1: Groundwater Dewatering and Discharge Measures: Groundwater, if encountered during construction, shall be handled and discharged in accordance with all state and federal regulations including the following: (a) Recovered groundwater shall be contained on-site and tested prior to discharge; (b) When testing determines water is suitable for land application, discharge may be applied to flat, vegetated, upland areas, used for dust control, or used in other suitable construction operations; (c) Land application shall be made in a manner that discharge does not result in substantial erosion; (d) Water unsuitable for land application shall be disposed of at an appropriately permitted facility; and (e) Discharge to surface waters or storm drains may occur only if permitted by the agency(ies) with jurisdiction over the resource (e.g., USACE, RWQCB, and/or CDFW, as applicable).	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to inspect compliance	During construction
Hydrology and Water Quality	Dewatering	APM WQ-1: Described above under Dewatering.			
Hydrology and Water Quality	Surface Water Quality	APM BIO-17: Described above under Biological Resources.			
Hydrology and Water Quality	Surface Water Quality	APM HAZ-1 through APM HAZ-4 : Described above under Hazards and Hazardous Materials.			
Hydrology and Water Quality	Surface Water Quality	PG&E FP-11, PG&E FP-12, PG&E FP-15, PG&E FP-16: Described above under Biological Resources.			
Hydrology and Water Quality	Surface Water Quality	Mitigation Measure 3.4-1c: Described above under Biological Resources.			
Hydrology and Water Quality	Surface Water Quality	Mitigation Measure 3.9-1a – 3.9-1c: Described above under Hazards and Hazardous Materials.			
Land Use and Planning	Community Access	Mitigation Measure 3.13-2a: Described in Transportation below.			
Mineral Resources		No mitigation required.			
Noise		No mitigation required.			
Population and Housing		No mitigation required.			
Public Services	Emergency Services Response	Mitigation Measure 3.17-2a: Described below under Transportation.			

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Recreation	Temporary Recreation Effects	APM REC-1: Trail Management Plan: LSPGC shall coordinate with the City of Fremont, City of Milpitas, City of San José, City of Santa Clara, the National Park Service (NPS), Metropolitan Transit Commission (MTC), and the USFWS for the preparation of the Project TMP. The TMP shall identify if a detour route(s) is required, as well as provide for trail-specific traffic control and safety measures for pedestrians, trail users, and motorists. Measures that may be implemented by LSPGC as part of the TMP include, but are not limited to, provision of a crossing guard during periods of active construction along the portions of the trails that would be directly impacted by construction of the Project or designation of a detour route if use of a crossing guard is not practical. Signage and flagging may be used to help direct trail users and provide safety for both trail users and construction crews. A copy of the TMP shall be provided to CPUC for recordkeeping.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to and during construction
Recreation	Temporary Recreation Effects	APM BIO-1, APM BIO-3, APM BIO-4, APM BIO-6, APM BIO-9, APM BIO-10, APM BIO-11, APM BIO-12, APM BIO-13, APM BIO-14, and APM BIO-15: Described above under Biological Resources.			
Recreation	Temporary Recreation Effects	APM CUL-1, APM CUL-2, APM CUL-3, APM CUL-4, APM CUL-5: Described above under Cultural Resources.			
Recreation	Temporary Recreation Effects	APM GEO-1: Described above under Geology, Soils, Seismicity, and Paleontological Resources.			
Recreation	Temporary Recreation Effects	APM PALEO-1 and APM PALEO-2: Described above under Geology, Soils, Seismicity, and Paleontological Resources.			
Recreation	Temporary Recreation Effects	Mitigation Measures 3.17-2a and 3.17-2b: Described in Transportation below.			
Recreation	Temporary Recreation Effects	Mitigation Measure 3.1-2: Described above under Aesthetics.			
Recreation	Temporary Recreation Effects	Mitigation Measures 3.4-1b, 3.4-1d, and 3.4-5: Described above under Biological Resources.			
Recreation	Temporary Recreation Effects	Mitigation Measure 3.5-1: Described above under Cultural Resources.			

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Transportation	Road Closures and Transit Services	APM TRA-2: Coordinate Bus Stop Closures: If bus stop closures are required for Project implementation, LSPGC shall coordinate closures with Santa Clara VTA and/or Alameda-Contra Costa County Transit ("AC Transit"), as appropriate, in advance of closure to minimize disruptions to service. Where disruptions to service are anticipated, advanced notice shall be given to allow transit users on effected routes to identify and locate a temporary interim bus stop(s). Measures that may be implemented to give advanced notice of disruptions to service may include, but not necessarily be limited to, posting signage at bus stops with planned closures and posting notices for anticipated route detours and bus stop closures on the Santa Clara VTA and AC Transit websites. Identification and implementation of specific measures shall be implemented in coordination with Santa Clara VTA and AC Transit.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to confirm compliance	During construction
Transportation	Road Closures and Transit Services	Mitigation Measure 3.17-2a: Implement Coordinated Traffic Control Plan: LSPGC shall coordinate with Project proponents, contractors, and local agencies, as applicable, for other construction projects in the Project's vicinity that may temporally overlap with Project construction, including, but not limited to, projects identified as potentially contributing to cumulative effects. In consideration of these coordination efforts, at least 30 days before the issuance of construction or building permits, LSPGC shall prepare and implement a traffic control plan for roadways adjacent to and directly affected by the Project. The traffic control plan shall address the transportation impact(s) of the temporally overlapping construction projects within the Project vicinity. The traffic control plan shall include, but not be limited to, the following requirements: (a) Coordination of individual traffic control plans for the Project with nearby projects. As is available, the individual traffic controls plans shall be appended to the Project's traffic control plan. (b) Coordination between LSPGC, Project proponents, contractors, and local agencies in developing circulation and detour plans that include safety features (e.g., signage and flaggers). The circulation and detour plans shall address (i) Full and partial roadway closures. (ii) Circulation and detour plans to include the use of signage and flagging to guide vehicles through or around the construction zone and any temporary traffic control devices. (iii) Bicycle or pedestrian detour plans, where applicable. (iv) Parking along public roadways. (v) Haul routes for construction trucks and staging areas for instances when multiple trucks arrive at the work sites. (vi) Protocols for updating the traffic control plan to account for delays or changes in the schedules of individual projects. LSPGC's traffic control plan, with proof of coordination, shall be submitted to the CPUC at least 30 days before the start of construction.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	At least 30 days prior to construction

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Transportation	Road Closures and Transit Services	Mitigation Measure 3.17-2b: Infrastructure Repair Reporting: After completion of the repair of any damaged roads, sidewalks, trails, and bicycle facilities resulting from Project construction activities, LSPGC shall submit a report to the CPUC and other jurisdictions whose facilities have been affected by Project construction (e.g., city, county, state, etc.) to confirm repairs are consistent with preconstruction conditions, and in accordance with applicable requirements associated with permits granted for the Project. The report shall be submitted within 30 days following completion of the repair(s).	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Within 30 days following repair and prior to Project close out
Tribal Cultural Resources		APM TCR-1: WEAP Training: LSPGC shall work with interested Tribes to design the TCRs component of a WEAP that shall be provided to all Project personnel who may encounter and/or alter TCRs or prehistoric/ethnohistoric archaeological properties, including construction supervisors and field personnel. The WEAP shall be submitted to the CPUC prior to construction. No construction worker shall be involved in ground-disturbing activities without having participated in the WEAP. The WEAP shall include, at a minimum: (a) Training on how to identify potential TCRs and human remains during the construction process. (b) A review of applicable regulations pertaining to TCRs. (c) A discussion of procedures to be followed in the event that unanticipated TCRs are discovered during implementation of the Project. (d) A discussion of culturally appropriate dignity, taking into account the Tribal cultural values and meaning of the resource, including the cultural character and integrity, traditional uses, and confidentiality of resources (e) A discussion of culturally appropriate dignity, taking into account the Tribal cultural values and meaning of the resource, including the cultural character and integrity, traditional uses, and confidentiality of resources. (f) A statement by the construction company or applicable employer agreeing to abide by the WEAP, LSPGC policies, and other applicable laws and regulations. The WEAP may be conducted in concert with other environmental or safety awareness and education programs for the Project, provided that the program elements pertaining to cultural resources are designed with the input of interested Tribes.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to and during all Project activities

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Tribal Cultural Resources		APM TCR-2: Native American Monitoring: Native American monitoring shall be conducted during ground disturbance associated with the Project when within 100 feet (30 meters) of previously recorded prehistoric, ethnohistoric, or TCRs. Prehistoric and/or ethnohistoric archaeological sites have been recorded within the Project area, and the SLF search and Tribal outreach indicates that lands sacred to the North Valley Yokuts Tribe and the Ohlone Indian Tribe are present within the Project search area. A Native American monitor determined during Tribal consultation shall be retained by LSPGC to monitor excavation associated with the Project to ensure that there is no impact to any significant unanticipated prehistoric, ethnohistoric, or TCR. Prior to construction, LSPGC shall confer with a designated Tribal representative on the appropriate course of action to be taken should unanticipated cultural materials, and specifically human remains, be discovered during construction. Native American monitoring requirements established in this APM may be superseded by government- to-government consultation conducted between the CPUC and Tribal organizations as part of the AB 52 process or otherwise.	LSPGC and its contractors to implement measure as defined	CPUC mitigation monitor to confirm compliance	Prior to and during all Project activities
Tribal Cultural Resources		APMs CUL-1 through CUL-5, PG&E BMPs CULT-1 through CULT-3, and Mitigation Measure 3.5-1, and Mitigation Measure 3.5-2 described in Cultural Resources, above.			
Utilities and Service Systems	Utility Conflicts	APM UTIL-1: Coordination with Utilities: LSPGC shall notify all utility companies with utilities located within or crossing the Project ROW to locate and mark existing underground utilities along the entire length of the Project. Due to the linear nature of transmission line construction, utilities shall be marked in short segments at least 72 hours prior to construction within said segments. No subsurface work shall be conducted that would conflict with (i.e., directly impact or compromise the integrity of) a buried utility. In the event of a conflict, areas of subsurface excavation shall be realigned vertically and/or horizontally, as appropriate, to avoid other utilities and provide adequate operational and safety buffering, or relocation of the existing utility shall be coordinated with each utility owner/operator. LSPGC shall coordinate with third-party utilities and shall submit the intended construction methodology to the owner of the third-party utility for review and coordination. Construction methods shall be adjusted as necessary to ensure that the integrity of existing utility lines is not compromised.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	Prior to and during all Project activities
Utilities and Service Systems	AC Corrosion	APM UTIL-1: Coordination with Utilities: Described above in Utility Conflicts			

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Utilities and Service Systems	AC Corrosion	Mitigation Measure 3.19-5: Utility Coordination and Induction Study: At least 90 days prior to the start of construction, LSPGC shall notify all municipalities, companies, and other public and private entities owning and maintaining utilities within or crossing the right-of-way of the Project, and shall positively identify and confirm the location and type of any utilities present. For those identified utilities that do not pose a threat of AC-induced corrosion attributable to the Project, APM UTIL-1 shall be implemented. For the three identified natural gas pipelines, and all other utilities potentially affected by Project-related AC-induced corrosion (i.e., coated metallic pipelines), design and construction of the Project's 230 kV transmission lines shall be coordinated with the applicable utility owners to definitively locate each utility relative to the Newark to NRS 230 kV transmission line, determine the distance of separation between the transmission line and potentially affected utility, and determine the point of intersection and/or distance along which the Project transmission line is parallel to the utility. LSPGC shall prepare a detailed induction study for all identified existing utilities potentially affected by the Project transmission line alignments. At minimum, the study shall include, but not be limited to, a detailed analysis of the known [coated metallic] pipelines or other utilities identified during these utility surveys (e.g., segment identification assessments); shall identify adequate and implementable measures to avoid corrosion potential; and shall present commitments to the implementation of those actions, including a design of the AC mitigation system for any pipeline found to exceed a time-weighted average of either 30 amperes per square meter, if DC current density exceeds 1 ampere per square meter, or 100 amperes per square meter, if DC current density is less than 1 ampere per square meter. Pursuant to Section 6.2 of National Association of Corrosion Engineers SP21424-2018, Alternating Current Corrosion on Cathodically Protected Pipelines: Risk Assessment, Mitigation and Monitoring, the induction study shall demonstrate that any required mitigation system would reduce an AC density level to either: (1) less than a time weighted average of 30 amperes per square meter if the DC current density exceeds 1 ampere per square meter, or (2) less than a time weighted average of 100 amperes per square meter if the DC current is less than 1 ampere per square meter No less than 60 days prior to the start of construction of a segment containing an underground utility or utilities identified as being materially affected by accelerated corrosion caused by the Project, LSPGC shall submit the full induction study for the affected segment, including the AC mitigation component, to the CPUC for review and concurrence. Once the CPUC concurrence is secured, LSPGC shall implement the AC mitigation system prior to energization of the Project, phased into the construction process as appropriate. LSPGC shall bear the cost of implementing and maintaining the AC mitigation system as it is part of the Project.	LSPGC and its contractors to implement measure as defined	CPUC to review and concur. CPUC mitigation monitor to confirm compliance	At least 90 days prior to construction
Wildfire	Emergency Response and Evacuation	Mitigation Measure 3.13-2a: Described in Transportation above.			

Environmental Impact	Environmental Impact Item	Applicant Proposed Measures (APMs), PG&E BMPs and FPs, and Mitigation Measures (MMs) Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Wildfire	Exacerbate Wildfire Risk	PG&E FP-8: No Fires, Litter, or Pets: Described in Biological Resources above.			
Wildfire	Exacerbate Wildfire Risk	PG&E FP-9: Fire Safety Measures: During fire season in designated State Responsibility Areas, equip all motorized equipment with federally approved or state-approved spark arrestors. Use a backpack pump filled with water and a shovel and fire-resistant mats and/or windscreens when welding. During fire “red flag” conditions as determined by Cal Fire, curtail welding. Each fuel truck will carry a large fire extinguisher with a minimum rating of 40 B:C. Clear parking and storage areas of all flammable materials.	PG&E and its contractors to implement measure as defined	PG&E to submit compliance report to CPUC	During construction

EXHIBIT B

CALIFORNIA STATE LANDS COMMISSION STATEMENT OF FINDINGS

1.0 INTRODUCTION

The California State Lands Commission (Commission or CSLC), acting as a responsible agency under the California Environmental Quality Act (CEQA), makes these findings to comply with CEQA as part of its discretionary approval to authorize issuance of a General Lease – Right-of-Way Use, to LS Power Grid California, LLC, for use of sovereign land associated with the proposed Power the South Bay Project (Project). (See generally Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.)¹ The Commission has jurisdiction and management authority over all ungranted tidelands, submerged lands, and the beds of navigable lakes and waterways. The Commission also has certain residual and review authority for tidelands and submerged lands legislatively granted in trust to local jurisdictions. (Pub. Resources Code, §§ 6301, 6306, 6009, subd. (c).) All tidelands and submerged lands, granted or ungranted, as well as navigable lakes and waterways, are subject to the protections of the common law Public Trust.

The Commission is a responsible agency under CEQA for the Project because the Commission must approve a lease for the Project to go forward and because the California Public Utilities Commission (CPUC), as the CEQA lead agency, has the principal responsibility for approving the Project and has completed its environmental review under CEQA. The CPUC analyzed the environmental impacts associated with the Project in a Final Environmental Impact Report (EIR) (State Clearinghouse [SCH] No. 2024071095) and, on March 19, 2026, certified the EIR and adopted a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP), Findings, and Statement of Overriding Considerations.

The Project involves the installation and use of 230-kilovolt (kV) electrical cables, communication lines, and ground continuity cables located within various

¹ CEQA is codified in Public Resources Code section 21000 et seq. The CEQA Guidelines are found in California Code of Regulations, title 14, section 15000 et seq.

conduits to be installed using surface trenching and horizontal directional drilling (HDD), a communication handhole, and vault.

The CPUC determined that the Project as a whole could have significant environmental effects on the following environmental resource areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

Of the 14 resources areas noted above, Project components within the Commission's jurisdiction could have significant environmental effects on 7 of the resource areas, as follows:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Tribal Cultural Resources

In certifying the Final EIR and approving the Project, CPUC imposed various measures for Project-related significant effects on the environment as conditions of Project approval and concluded that Project-related impacts would be substantially lessened with implementation of these measures such that the impacts would be less than significant for most resource areas. However, even with the integration of all feasible mitigation, CPUC concluded in the EIR that some of the identified impacts would remain significant. As a result, CPUC adopted a Statement of Overriding Considerations to support its approval of the Project

despite the significant and unavoidable impacts. The CPUC determined that, after mitigation, the Project may still have significant impacts on Air Quality because dust emission impacts from the Silicon Valley Power Northern Receiving Station 230kV Substation activities are outside the enforcement authority of CPUC. These significant impacts are also outside the jurisdiction and approval authority of the Commission, and therefore a Statement of Overriding Considerations is not required by the Commission.

As a responsible agency, the Commission complies with CEQA by considering the EIR and reaching its own conclusions on whether, how, and with what conditions to approve a project. In doing so, the Commission may require changes in a project to lessen or avoid the effects, either direct or indirect, of that part of the project which the Commission will be called on to carry out or approve. In order to ensure the identified measures and/or Project revisions are implemented, the Commission adopts the Mitigation Monitoring Program (MMP) as set forth in Exhibit A as part of its Project approval.

2.0 ADMINISTRATIVE RECORD OF PROCEEDINGS AND CUSTODIAN OF THE RECORD

These Findings are supported by substantial evidence contained in the EIR and other relevant information provided to the Commission or existing in its files, all of which is contained in the administrative record. The administrative record is located at the California State Lands Commission, 100 Howe Avenue, Suite 100-South, Sacramento, CA 95825. The custodian for the administrative record is the California State Lands Commission Division of Environmental Science, Planning, and Management.

3.0 FINDINGS

The Commission's role as a responsible agency affects the scope of, but not the obligation to adopt, findings required by CEQA. Findings are required under CEQA by each "public agency" that approves a project for which an EIR has been certified that identifies one or more significant impacts on the environment. (Pub. Resources Code, § 21081, subd. (a); CEQA Guidelines, § 15091, subd. (a).) Because the EIR certified by CPUC for the Project identifies potentially significant impacts that fall within the scope of the Commission's approval, the Commission makes the Findings set forth below as a responsible agency under CEQA. (CEQA Guidelines, §

15096, subd. (h); *Riverwatch v. Olivenhain Mun. Water Dist.* (2009) 170 Cal.App.4th 1186, 1202, 1207.

While the Commission must consider the environmental impacts of the Project as set forth in the EIR, the Commission's obligation to mitigate or avoid the direct or indirect environmental impacts of the Project is limited to those parts which it decides to carry out, finance, or approve. (Pub. Resources Code, § 21002.1, subd. (d); CEQA Guidelines, §§ 15041, subd. (b), 15096, subds. (f)-(g).) Accordingly, because the Commission's exercise of discretion involves only issuing a General Lease – Right-of-Way Use for this Project, the Commission is responsible for considering only the environmental impacts related to lands or resources subject to the Commission's jurisdiction. With respect to all other impacts associated with implementation of the Project, the Commission is bound by the legal presumption that the EIR fully complies with CEQA.

The Commission has reviewed and considered the information contained in the Project EIR. All significant adverse impacts of the Project identified in the EIR relating to the Commission's approval of a General Lease – Right-of-Way Use, including the installation of 230-kilovolt (kV) electrical cables, communication lines, and ground continuity cables located within various conduits, a communication handhole, and vault, are included herein and organized according to the resource affected.

These Findings, which reflect the independent judgment of the Commission, are intended to comply with CEQA's mandate that no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects unless the agency makes written findings for each of those significant effects. Possible findings on each significant effect are:

1. Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the Commission. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

A discussion of supporting facts follows each Finding.

- Whenever Finding (1) occurs, the measures that lessen the significant environmental impact are identified in the facts supporting the Finding.

- Whenever Finding (2) occurs, the agencies with jurisdiction are specified. These agencies, within their respective spheres of influence, have the responsibility to adopt, implement, and enforce the mitigation discussed.

The measures are briefly described in these Findings; more detail on the measures is included in the Final EIR. For the full text of each measure, please refer to Exhibit A, Attachment A-1.

A. SUMMARY OF FINDINGS

Based on public scoping, the proposed Project will have No Impact on the following environmental resource areas:

Agricultural Resources
Mineral Resources

The EIR subsequently identified the impacts to the following resource areas as Less Than Significant:

Energy
Geology, Soils, and Paleontology
Noise and Vibration
Population and Housing

For the remaining potentially significant effects, the Findings are organized by significant impacts within the EIR resource areas as presented below.

B. POTENTIALLY SIGNIFICANT IMPACTS

The impacts within the Commission's jurisdiction, identified in Table B-1, were determined in the Final EIR to be potentially significant absent mitigation. After application of mitigation, however, all impacts within the Commission jurisdiction were determined to be less than significant (LTSM).

Table B-1 – Significant Impacts by Resource Area

Environmental Resource Area	Impact Nos. (LTSM)
Aesthetic	3.1-2, C.3.1-2
Air Quality	3.3-1, 3.3-2, 3.3-3, C.3.3-1, C.3.3-2, C.3.3-3
Biological Resources	3.4-1, 3.4-2, 3.4-3, 3.4-4, C.3.4-1, C.3.4-3
Cultural Resources	3.5-1, 3.5-2, C.3.5-1
Hazards and Hazardous Materials	3.9-1, 3.9-3

Environmental Resource Area	Impact Nos. (LTSM)
Hydrology and Water Quality	3.10-1, 3.10-4, 3.10-6, C.3.10-1, C.3.10-4, C.3.10-6
Tribal Cultural Resources	3.18-1, 3.18-2, C.3.18-1

C. IMPACTS REDUCED TO LESS THAN SIGNIFICANT LEVELS WITH MITIGATION

The impacts identified below were determined in the Final EIR to be potentially significant absent mitigation; however, the impacts were determined to be less than significant with mitigation (LTSM).

1. AESTHETICS

CEQA Finding No. 1

Impacts:	3.1-2. The Project would not create a new source of substantial light or glare would adversely affect daytime or nighttime views in the area. C.3.1-2. The Project, in combination with the cumulative projects, would not create a new source of substantial light or glare would adversely affect daytime or nighttime views in the area.
Finding(s):	(1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

Staging areas proposed as part of the Project, and in combination with cumulative projects, have the potential to create a temporary source of substantial light because lighting would be installed in staging areas for security purposes. The EIR identified measures that would require all lighting to be selectively placed, shielded, and directed downward as well as using photocell and motion detection-controlled lighting to minimize fugitive light sources.

Implementation of Applicant Proposed Measure (APM) BIO-10 and Mitigation Measure (MM) 3-1.2 has been incorporated into the Project to reduce this impact to a less than significant level.

APM BIO-10: Outdoor Lighting Measures

MM 3.1-2: Minimize Fugitive Light from Temporary Sources Used for Construction

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

2. AIR QUALITY

CEQA Finding No. 2

Impacts: **3.3-1. The Project would conflict with or obstruct implementation of the applicable air quality plan.**

C3.3-1. The Project impact of conflicting with or obstructing implementation of the applicable air quality plans would be cumulatively considerable.

Finding(s): (1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

The use of heavy construction equipment that is proposed as part of the Project, and in combination with cumulative projects, would create a temporary source of exhaust with criteria pollutant emissions that would potentially exceed Bay Area Air Quality Management District (BAAQMD) thresholds, potentially conflicting or obstructing implementation of the 2017 Clean Air Plan. The EIR identified measures that would require at least 75 percent of heavy construction equipment to include Tier 4 final emissions controls to reduce exhaust emissions and would require the use of best management practices to control construction-related fugitive dust, such as watering exposed surfaces two times per day covering truck beds transporting soil, sand, or other loose materials off-site, and limiting vehicle speeds on unpaved roads.

Implementation of MM 3.3-2a and MM 3.3-2b has been incorporated into the Project to reduce this impact to a less than significant level.

MM 3.3-2a: Construction Fleet Minimum Requirements and Tracking – Tier 4 Final Emissions Controls

MM 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

CEQA Finding No. 3

Impacts: **3.3-2. The Project would result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard.**

C.3.3-2. The Project impact of generating a net increase of criteria pollutants for which the Project region is nonattainment under an applicable federal or state ambient air quality standard would be cumulatively considerable.

Finding(s): (1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

The use of heavy construction equipment that is proposed as part of the Project, and in combination with cumulative projects, would create a temporary source of exhaust and dust emissions that could contribute to an increase of nonattainment criteria pollutants in the Project region, including ROG, NO_x, PM₁₀ and PM_{2.5}, that would exceed BAAQMD thresholds. The EIR identified measures that would require at least 75 percent of equipment include Tier 4 final emissions controls to reduce exhaust emissions and would require the use of best management practices to control construction-related fugitive dust, such as watering exposed surfaces two times per day covering truck beds transporting soil, sand, or other loose materials off-site, and limiting vehicle speeds on unpaved roads.

Implementation of MM 3.3-2a and MM 3.3-2b has been incorporated into the Project to reduce this impact to a less than significant level.

MM 3.3-2a: Construction Fleet Minimum Requirements and Tracking – Tier 4 Final Emissions Controls

MM 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

CEQA Finding No. 4

Impacts: **3.3-3. The Project would expose sensitive receptors to substantial pollutant concentrations.**

C.3.3-3. The Project impact of exposing sensitive receptors to pollutant concentrations would be cumulatively considerable.

Finding(s): (1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

The use of heavy construction equipment that is proposed as part of the Project, and in combination with cumulative projects, would create a temporary source of exhaust and dust emissions that could expose sensitive receptors that are adjacent to Commission jurisdiction to substantial pollutant concentrations. The EIR identified measures that would require at least 75 percent of equipment include Tier 4 final emissions controls to reduce exhaust emissions and would require the use of best management practices to control construction-related fugitive dust, such as watering exposed surfaces two times per day covering truck beds transporting soil, sand, or other loose materials off-site, and limiting vehicle speeds on unpaved roads.

Implementation of MM 3.3-2a and MM 3.3-2b has been incorporated into the Project to reduce this impact to a less than significant level.

MM 3.3-2a: Construction Fleet Minimum Requirements and Tracking – Tier 4 Final Emissions Controls

MM 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

3. BIOLOGICAL RESOURCES

CEQA Finding No. 5

Impacts: **3.4-1. The Project would have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.**

C.3.4-1. The Project, in combination with the cumulative projects, would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

Finding(s): (1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

The clearing of vegetation at the construction sites that is proposed as part of the Project, and in combination with cumulative projects, has the potential to impact candidate, sensitive, or special-status species through potential harm or mortality as well as through temporary habitat modifications. The EIR identified measures that would require both avoidance and restoration activities that include worker awareness training, avoiding rare plants and wildlife, doing sensitive-species surveys, sensitive area demarcation, and restoring the site to pre-construction levels.

Implementation of APMs BIO-1 through BIO-6; APMs BIO-8 through BIO-13; APMs BIO-15 through BIO-19; PG&E BMP BIO-2; PG&E FP-1, FP-4, FP-6, FP-8, FP-10, FP-16; MM 3.1-2; and MMs 3.4-1a through 3.4-1e has been incorporated into the Project to reduce this impact to a less than significant level.

APM BIO-1: Restoration of Disturbed Areas

APM BIO-2: Rare Plant Surveys

APM BIO-3: Preconstruction Sweeps

APM BIO-4: Sensitive Area Demarcation

APM BIO-5: Vehicle Cleaning Prior to Entering Natural Areas

APM BIO-6: Vehicle Speed Limits

APM BIO-8: Excavation Wildlife Safety Best Management Practices

APM BIO-9: Worker Environmental Awareness (WEAP) Training

APM BIO-10: Outdoor Lighting Measures

APM BIO-11: Special-Status Bird Surveys

APM BIO-12: Nesting Bird Protection Measures

APM BIO-13: Raptor Surveys

APM BIO-15: Nesting Bird Surveys

APM BIO-16: Special-Status Invertebrate Surveys

APM BIO-17: Wetland, Vernal Pool, and Waterway Construction Timing Restricting

APM BIO-18: Special-Status Amphibian Surveys

APM BIO-19: Wetland and Aquatic Resources Delineations

PG&E BMP BIO-2: Nesting Birds

PG&E FP-1: Worker training

PG&E FP-4: Minimize impacts on biological resources

PG&E FP-6: Inspect pipes and culverts for species

PG&E FP-8: No fires, litter, or pets

PG&E FP-10: Minimize activity footprint and time spent at a work location

PG&E FP-16: 250 feet buffer from vernal pools and 50 feet from wetlands, ponds, or riparian areas

MM 3.1-2: Minimize Fugitive Light from Temporary Sources Used for Construction

MM 3.4-1a: Avoid Impacts to Rare Plants

MM 3.4-1b: Habitats Restoration and Monitoring

MM 3.4-1c: Frac-out Plan

MM 3.4-1d: Protection of Special-Status Wildlife

MM 3.4-1e: Construction Worker Environmental Awareness Training Program (WEAP)

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

CEQA Finding No. 6

Impact: **3.4-2. The Project would have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.**

Finding(s): (1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

The clearing of vegetation at the construction sites that is proposed as part of the Project has the potential to temporarily or permanently damage riparian habitat. The EIR identified measures that would require both avoidance and restoration activities to include sensitive area determination and demarcation as well as restoring the site to pre-construction levels.

Implementation of APM BIO-1, APM BIO-4, APM BIO-19, MM 3.4-1b, and MM 3.4-1d has been incorporated into the Project to reduce this impact to a less than significant level.

APM BIO-1: Restoration of Disturbed Areas

APM BIO-4: Sensitive Area Demarcation

APM BIO-19: Wetland and Aquatic Resources Delineations

MM 3.4-1b: Habitats Restoration and Monitoring

MM 3.4-1d: Protection of Special-Status Wildlife

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

CEQA Finding No. 7

Impact: **3.4-3. The Project would have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means.**

C.3.4-3. The Project, in combination with the cumulative projects, would not have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means.

Finding(s): (1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

The HDD activities used to construct the conduit for the transmission lines have the potential to impact state or federally protected wetlands, as part of the Project and in combination with cumulative projects within the region, through direct removal, filling, hydrological interruption, or other means. The EIR identified measures that would require both avoidance and restoration activities that include worker awareness training, establishing a buffer around wetlands, sensitive area demarcation, restoring habitats and monitoring the success of the restoration, and restoring the site overall to pre-construction levels.

Implementation of APM BIO-1, APM BIO 4, APM BIO-19, PG&E FP-1, PG&E FP-14 through FP-16, and MM 3.4-1b has been incorporated into the Project to reduce this impact to a less than significant level.

APM BIO-1: Restoration of Disturbed Areas

APM BIO-4: Sensitive Area Demarcation

APM BIO-19: Wetland and Aquatic Resources Delineations

PG&E FP-1: Worker training

PG&E FP-14: Revegetate with “weed free” seed mix

PG&E FP-15: Refuel more than 250 feet from vernal pools and 100 feet from wetlands, streams, or waterways

PG&E FP-16: 250 feet buffer from vernal pools and 50 feet from wetlands, ponds, or riparian areas

MM 3.4-1b: Habitats Restoration and Monitoring

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

CEQA Finding No. 8

Impact: **3.4-4. The Project would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.**

Finding(s): (1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

The HDD activities used to construct the conduit for the transmission lines has the potential to impact movement of resident or migratory fish or wildlife species within the staging area, as construction equipment could impede wildlife movement. Additionally, an inadvertent frac-out in the Guadalupe River or Coyote Creek could interfere with the movement of resident or migratory fish or wildlife species. The EIR identified measures that would require both avoidance and restoration activities that include worker awareness training, establishing wetlands buffers, avoiding using vehicles in vegetated areas, erosion and sediment control, avoiding rare plants and wildlife, doing sensitive-species surveys, sensitive area demarcation, development of a frac-out plan, and restoring the site to pre-construction levels.

Implementation of APM BIO-1, APM BIO-4, APM BIO-6, APM BIO-9, APM BIO-10, APM BIO-17, PG&E BMP BIO-2, PG&E FP-1 through FP-4, FP-6, FP-10 through FP-12, FP-14 through FP-16, and MM 3.4-1b through MM 3.4-1e has been incorporated into the Project to reduce this impact to a less than significant level.

APM BIO-1: Restoration of Disturbed Areas

APM BIO-4: Sensitive Area Demarcation

APM BIO-6: Vehicle Speed Limits

APM BIO-9: Worker Environmental Awareness (WEAP) Training

APM BIO-10: Outdoor Lighting Measures

APM BIO-17: Wetland, Vernal Pool, and Waterway Construction Timing Restricting

PG&E BMP BIO-2: Nesting Birds

PG&E FP-1: Worker training

PG&E FP-2: Park outside sensitive areas

PG&E FP-3: Use existing access roads

PG&E FP-4: Minimize impacts on biological resources

PG&E FP-6: Inspect pipes and culverts for species

PG&E FP-10: Minimize activity footprint and time spent at a work location

PG&E FP-11: Erosion and sediment control BMPs

PG&E FP-12: Contain and cover stockpile soil

PG&E FP-14: Revegetate with “weed free” seed mix

PG&E FP-15: Refuel more than 250 feet from vernal pools and 100 feet from wetlands, streams, or waterways

PG&E FP-16: 250 feet buffer from vernal pools and 50 feet from wetlands, ponds, or riparian areas

MM 3.4-1b: Habitats Restoration and Monitoring

MM 3.4-1c: Frac-out Plan

MM 3.4-1d: Protection of Special-Status Wildlife

MM 3.4-1e: Construction Worker Environmental Awareness Training Program (WEAP)

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

4. CULTURAL RESOURCES

CEQA Finding No. 9

Impact: **3.5-1. The Project would not cause a substantial adverse change in the significance of an archaeological resources pursuant to Section 15064.5.**

Finding(s): (1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

The HDD activities used to construct the conduit for the transmission lines have the potential to impact previously undiscovered archaeological resources through ground disturbing activities associated with construction. The EIR identified measures that would require worker awareness training, archaeological and Native American monitoring, measures in the event of unanticipated discovery of cultural resources and human remains, and preparation of an archaeological monitoring plan.

Implementation of APMs CUL-1 through CUL-4, PG&E BMP CULT-1, PG&E BMP CULT-2, MM 3.5-1, and MM 3.5-2 has been incorporated into the Project to reduce this impact to a less than significant level.

APM CUL-1: Worker Environmental Awareness Program (WEAP) Training

APM CUL-2: Archaeological and Native American Monitoring

APM CUL-3: Unanticipated Discovery of Potentially Significant Prehistoric and Historic Resources

APM CUL-4: Cultural Resources Inventory

PG&E BMP CULT-1: Worker Awareness Training

PG&E BMP CULT-2: Inadvertent Discovery

MM 3.5-1: Archaeological Monitoring Plan

MM 3.5-2: Unanticipated Discovery of Submerged Cultural Resources

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

CEQA Finding No. 10

Impact: **3.5-2: The Project would not disturb any human remains, including those interred outside of dedicated cemeteries**

Finding(s): (1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

The HDD activities used to construct the conduit for the transmission lines has the potential to disturb human remains through ground disturbing activities associated with construction. The EIR identified measures that would require worker awareness training, archaeological and Native American monitoring, measures in the event of unanticipated discovery of human remains, and preparation of an archaeological monitoring plan.

Implementation of APM CUL-1, APM CUL-2, APM CUL-5, PG&E BMP CULT-1, PG&E BMP CULT-3, MM 3.5-1, and MM 3.5-2 has been incorporated into the Project to reduce this impact to a less than significant level.

APM CUL-1: Worker Environmental Awareness Program (WEAP) Training

APM CUL-2: Archaeological and Native American Monitoring

APM CUL-5: Unanticipated Discovery of Human Remains

PG&E BMP CULT-1: Worker Awareness Training

PG&E BMP CULT-3: Human Remains

MM 3.5-1: Archaeological Monitoring Plan

MM 3.5-2: Unanticipated Discovery of Submerged Cultural Resources

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

CEQA Finding No. 11

Impact:	C.3.5-1. The Project, in combination with the cumulative projects, would not cause substantial adverse change in the significance of a historical resource pursuant to Section 15064.5; would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; and would not disturb any human remains, including those interred outside of dedicated cemeteries.
Finding(s):	(1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

The HDD activities used to construct the conduit for the transmission lines, as part of the Project and in combination with other projects in the region, has the potential to impact archaeological resources, cultural resources, or human remains through ground disturbing activities associated with construction. The EIR identified measures that would require monitoring of areas within 100 feet of previously recorded resources, halting work in the vicinity of a find until it is evaluated, and preparation of an archaeological monitoring plan.

Implementation of MM 3.5-1 and MM 3.5-2 has been incorporated into the Project to reduce this impact to a less than significant level.

MM 3.5-1: Archaeological Monitoring Plan

MM 3.5-2: Unanticipated Discovery of Submerged Cultural Resources

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

5. HAZARDS AND HAZARDOUS MATERIALS

CEQA Finding No. 12

Impact:	3.9-1: The Project would involve the routine transport, use, and disposal of hazardous materials that could result in an accidental release of hazardous materials into the environment.
Finding(s):	(1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

The HDD activities used to construct the conduit for the transmission lines will involve the transport, use, and disposal of hazardous materials that have the potential to be released into the environment through accidental leaks. The EIR identified measures that would require a hazardous materials management plan, site-specific spill prevention plan, a health and safety plan, and compliance with local regulations.

Implementation of APM HAZ-1, APM HAZ-2, PG&E BMP HAZ-2, PG&E BMP HAZ-3, PG&E BMP HAZ-7, and MMs 3.9-1a through 3.9-1c has been incorporated into the Project to reduce this impact to a less than significant level.

APM HAZ-1: Site-Specific Spill Prevention, Control, and Countermeasure Plan

APM HAZ-2: Hazardous Materials Management Plan

PG&E BMP HAZ-2: Hazardous Materials Business Plan (HMBP)

PG&E BMP HAZ-3: Hazardous Waste Management

PG&E BMP HAZ-7: Spill Prevention, Control, and Countermeasure (SPCC) Plan

MM 3.9-1a: Pre-Construction Hazardous Materials Assessment

MM 3.9-1b: Health and Safety Plan

MM 3.9-1c: Soil and Groundwater Management Plan

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

CEQA Finding No. 13

Impact:	3.9-3: The Project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, but would not create a significant hazard to the public or the environment.
Finding(s):	(1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

One of the HDD sites where the conduit for the transmission lines that is proposed as part of the Project is located is on the Cisco Systems 6 (EnviroStor Case Number 43010027) site that is contaminated with metals and volatile organic compounds. The EIR identified measures that would require a pre-construction hazardous materials assessment, a hazardous materials management plan, a health and safety plan, and compliance with local regulations.

Implementation of APMs HAZ-2 through HAZ-4, PG&E BMP HAZ-3, and MMs 3.9-1a through 3.9-1c has been incorporated into the Project to reduce this impact to a less than significant level.

APM HAZ-2: Hazardous Materials Management Plan

APM HAZ-3: Compliance with the Covenant to Restrict Use of Property

APM HAZ-4: Compliance with the Covenant and Agreement for Environmental Restriction

PG&E BMP HAZ-3: Hazardous Waste Management

MM 3.9-1a: Pre-Construction Hazardous Materials Assessment

MM 3.9-1b: Health and Safety Plan

MM 3.9-1c: Soil and Groundwater Management Plan

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

6. HYDROLOGY AND WATER QUALITY

CEQA Finding No. 14

Impact:	3.10-1: Construction of the Project could violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. C.3.10-1: The Project's impacts associated with violation of water quality standards, waste discharge requirements, or other Project degradation of surface or ground water quality would not be cumulatively considerable.
Finding(s):	(1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

The HDD activities used to construct the conduit for the transmission lines, as part of the Project and in combination with other projects in the region, has the potential to violate water quality standards or degrade surface water through the release of sediment and pollutants. The EIR identified measures that would require a frac-out plan, erosion and sediment control, and wetlands construction timing restrictions.

Implementation of APM WQ-1, APM BIO-17, PG&E FP-11, PG&E FP-12, and MM 3.4-1c has been incorporated into the Project to reduce this impact to a less than significant level.

APM WQ-1: Groundwater Dewatering and Discharge Measures

APM BIO-17: Wetland, Vernal Pool, and Waterway Construction Timing Restricting

PG&E FP-11: Erosion and sediment control BMPs

PG&E FP-12: Contain and cover stockpile soil

MM 3.4-1c: Frac-out Plan

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

CEQA Finding No. 15

Impact:	3.10-4: The Project would create or contribute runoff water which could exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. C.3.10-4: The Project, in combination with the cumulative project, would create or contribute runoff water which could exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.
Finding(s):	(1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

The HDD construction activities for the transmission lines conduit, proposed as part of the Project and in combination with other projects in the region, have the potential to contribute to polluted runoff water from mobilized sediment and other pollutants in stormwater that could exceed the capacity of existing stormwater drainage systems. The EIR identified measures that would require a spill prevention plan, a hazardous material management plan, pre-construction hazardous material assessment, health and safety plan, soil and groundwater management plan, and compliance with local regulations.

Implementation of APMs HAZ-1 through HAZ-4 and MMs 3.9-1a through 3.9-1c has been incorporated into the Project to reduce this impact to a less than significant level.

APM HAZ-1: Site-Specific Spill Prevention, Control, and Countermeasure Plan

APM HAZ-2: Hazardous Materials Management Plan

APM HAZ-3: Compliance with the Covenant to Restrict Use of Property

APM HAZ-4: Compliance with the Covenant and Agreement for Environmental Restriction

MM 3.9-1a: Pre-Construction Hazardous Materials Assessment

MM 3.9-1b: Health and Safety Plan

MM 3.9-1c: Soil and Groundwater Management Plan

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

CEQA Finding No. 16

Impact:	3.10-6: The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. C.3.10-6: The Project, in combination with the cumulative project, would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan.
Finding(s):	(1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

The HDD activities used to construct the conduit for the transmission lines, as part of the Project and in combination with other projects in the region, has the potential to conflict with a water quality control plan or sustainable groundwater management plan due to released sediment and other pollutants. The EIR identified measures that would require a frac-out plan and groundwater dewatering and discharge measures.

Implementation of APM WQ-1 and MM 3.4-1c has been incorporated into the Project to reduce this impact to a less than significant level.

APM WQ-1: Groundwater Dewatering and Discharge Measures

MM 3.4-1c: Frac-out Plan

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

7. TRIBAL CULTURAL RESOURCES

CEQA Finding No. 17

Impact: **3.18-1. The Project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources. Code Section 5020.1(k).**

Finding(s): (1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

The HDD activities used to construct the conduit for the transmission lines has the potential to impact previously undiscovered tribal cultural resources through ground disturbing activities associated with construction. The EIR identified measures that would require worker awareness training, archaeological and Native American monitoring, measures in the event of unanticipated discovery of cultural resources and human remains, and preparation of an archaeological monitoring plan.

Implementation of APMs CUL-1 through CUL-5, APM TCR-1, APM TCR-2, PG&E BMPs CULT-1 through CULT-3, MM 3.5-1, and MM 3.5-2 has been incorporated into the Project to reduce this impact to a less than significant level.

APM CUL-1: Worker Environmental Awareness Program (WEAP) Training

APM CUL-2: Archaeological and Native American Monitoring

APM CUL-3: Unanticipated Discovery of Potentially Significant Prehistoric and Historic Resources

APM CUL-4: Cultural Resources Inventory

APM CUL-5: Unanticipated Discovery of Human Remains

APM TCR-1: WEAP Training

APM TCR-2: Native American Monitoring

PG&E BMP CULT-1: Worker Awareness Training

PG&E BMP CULT-2: Inadvertent Discovery

PG&E BMP CULT-3: Human Remains

MM 3.5-1: Archaeological Monitoring Plan

MM 3.5-2: Unanticipated Discovery of Submerged Cultural Resources

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

CEQA Finding No. 18

Impact: **3.18-2. The Project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.**

Finding(s): (1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

The HDD activities used to construct the conduit for the transmission lines has the potential to impact previously undiscovered tribal cultural resources through ground disturbing activities associated with construction. The EIR identified measures that would require worker awareness training, archaeological and Native American Monitoring, measures in the event of unanticipated discovery of cultural resources and human remains, and preparation of an archaeological monitoring plan.

Implementation of APMs CUL-1 through CUL-5, APM TCR-1, APM TCR-2, PG&E BMPs CULT-1 through CULT-3, MM 3.5-1, and MM 3.5-2 has been incorporated into the Project to reduce this impact to a less than significant level.

APM CUL-1: Worker Environmental Awareness Program (WEAP) Training

APM CUL-2: Archaeological and Native American Monitoring

APM CUL-3: Unanticipated Discovery of Potentially Significant Prehistoric and Historic Resources

APM CUL-4: Cultural Resources Inventory

APM CUL-5: Unanticipated Discovery of Human Remains

APM TCR-1: WEAP Training

APM TCR-2: Native American Monitoring

PG&E BMP CULT-1: Worker Awareness Training

PG&E BMP CULT-2: Inadvertent Discovery

PG&E BMP CULT-3: Human Remains

MM 3.5-1: Archaeological Monitoring Plan

MM 3.5-2: Unanticipated Discovery of Submerged Cultural Resources

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

CEQA Finding No. 19

Impact:	C.3.18-2. The Project, in combination with the cumulative projects, would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is: listed or eligible for listing in the California Register, or in a local register of historical resources as defined in PRC Section 5020.1(k), or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.
Finding(s):	(1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

The HDD activities used to construct the conduit for the transmission lines that is proposed as part of the Project, in combination with other projects in the region, has the potential to impact tribal cultural resources through ground disturbing activities associated with construction. The EIR identified measures that would require worker awareness training, archaeological and Native American Monitoring, measures in the event of unanticipated discovery of cultural resources and human remains, and preparation of an archaeological monitoring plan.

Implementation of APMs CUL-1 through CUL-5, APM TCR-1, APM TCR-2, PG&E BMPs CULT-1 through CULT-3, MM 3.5-1, and MM 3.5-2 has been incorporated into the Project to reduce this impact to a less than significant level.

APM CUL-1: Worker Environmental Awareness Program (WEAP) Training

APM CUL-2: Archaeological and Native American Monitoring

APM CUL-3: Unanticipated Discovery of Potentially Significant Prehistoric and Historic Resources

APM CUL-4: Cultural Resources Inventory

APM CUL-5: Unanticipated Discovery of Human Remains

APM TCR-1: WEAP Training

APM TCR-2: Native American Monitoring

PG&E BMP CULT-1: Worker Awareness Training

PG&E BMP CULT-2: Inadvertent Discovery

PG&E BMP CULT-3: Human Remains

MM 3.5-1: Archaeological Monitoring Plan

MM 3.5-2: Unanticipated Discovery of Submerged Cultural Resources

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

E. FINDINGS ON ALTERNATIVES

The Commission, as a responsible agency and pursuant to CEQA Guidelines section 15096, subdivision (g)(2), finds there are no feasible Project alternatives within its powers that would substantially lessen or avoid any outstanding significant effects that the Project, as proposed, would have on the environment.

4.0 CONCLUSION

Based upon the objectives identified in the EIR and the detailed measures imposed upon the Project, the Commission has determined the measures found in Exhibit A, Mitigation Monitoring Program, are sufficient to warrant approving the Project.