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APPENDIX A
Joint Motion for settlement with Exhibits

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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C2312020

County of Nevada, Complainant,

v.

Pacific Gas and Electric Company (U39E),
Defendant

C.23-12-020
(Filed December 12, 2023)

**JOINT MOTION FOR ADOPTION
OF SETTLEMENT AGREEMENT**

PACIFIC GAS AND ELECTRIC COMPANY

David Kraska

Erica J. Schlemer

Pacific Gas and Electric Company

300 Lakeside Drive

Oakland, California 94612

Telephone: (415) 722-1851

Email: david.kraska@pge.com

erica.schlemer@pge.com

DOWNEY BRAND LLP

Megan J. Somogyi

Christopher Marelich

455 Market Street, Suite 1500

San Francisco, California 94105

Telephone: 415.848.4800

Facsimile: 415.848.4801

Email: msomogyi@downeybrand.com

cmarelich@downeybrand.com

Attorneys for Pacific Gas and Electric Company

Attorneys for County of Nevada

Dated: March 17, 2025

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

County of Nevada, Complainant,

v.

Pacific Gas and Electric Company (U39E),
Defendant

C.23-12-020
(Filed December 12, 2023)

**JOINT MOTION FOR ADOPTION
OF SETTLEMENT AGREEMENT**

In accordance with Rules 11.1 and 12.1 of the Commission’s Rules of Practice and Procedure, the County of Nevada and Pacific Gas and Electric Company (collectively, the Parties) submit this joint motion for approval and adoption of the Settlement Agreement provided as Attachment A to this motion. The Settlement Agreement reflects compromise among the Parties’ litigation positions to resolve all disputed issues raised in this proceeding. The Parties believe the Settlement Agreement is reasonable in light of the whole record, consistent with law, and in the public interest.

I. PROCEDURAL HISTORY

Nevada County filed C.23-12-020 on December 12, 2023. The complaint alleged that PG&E violated Section VII.B of General Order 177, which requires utilities to consult with local agencies regarding land use matters when locating gas facilities. The complaint alleged that PG&E failed to meet that requirement in the course of acquiring a parcel of land and installing a liquefied natural gas (LNG) injection station, which resulted in significant impacts to a well-known local landmark commonly referred to as “Hell’s Half Acre.” The complaint requested three categories of relief: (1) that PG&E perform full restoration of the portions of Hell’s Half Acre not occupied by the LNG injection station and access roads; (2) that PG&E engage

proactively with the County regarding all future infrastructure projects in the County, with specific requirements for information to be provided and outreach to be undertaken; and (3) that PG&E acquire mitigation lands in the immediate vicinity of Hell's Half Acre and convey them to a local nonprofit under a permanent conservation easement.

PG&E filed its Answer on February 29, 2024. The Answer took the position that PG&E conducted adequate consultation with the County in the course of planning and installing the injection station, and that, while the consultation did not yield the results the County wished for, PG&E's actions did not constitute a breach of General Order 177, Section VII.B.

Shortly after PG&E filed its Answer, the Parties began settlement discussions.

A prehearing conference was held on March 26, 2024. The Parties reported that settlement discussions were underway and had been productive, but that the Parties were not yet in a position to reach an agreement in principle.

On May 7, 2024, the Assigned Commissioner's Scoping Memo and Ruling was issued. The Scoping Ruling noted the Parties' commitment to file a joint settlement status report by May 10, and set a status conference for June 7.

The Parties filed a joint settlement status report on May 10, 2024. The report noted that settlement discussions were ongoing and productive, but that it was not clear whether the Parties could reach an agreement in principle before the June 7 status conference. The Parties stated their intention to continue settlement discussions and provide an update at the status conference.

On June 6, 2024, the Administrative Law Judge issued a ruling granting the Parties an additional 60 days to continue settlement discussions and directing that the Parties submit another status report by August 23.

On August 23, 2024, the Parties filed their second joint status report, which stated that

settlement discussions continued to be productive and were likely to result in a complete resolution of the dispute. Because the parties had not been able to finalize the terms of an agreement in principle by the status report due date, they committed to continuing the settlement process and providing any further updates as directed.

On October 23, 2024, the Administrative Law Judge issued an email to the Parties and service list noting that the statutory deadline was fast approaching and directing the Parties to inform her of their intentions regarding resolution of the proceeding. On October 24, the Parties informed the Administrative Law Judge by email that they intended to file a joint motion for a six-month extension of the statutory deadline, which would be followed by a settlement agreement and accompanying motion for approval.

On November 6, 2024, the Parties filed the joint motion requesting an order extending the statutory deadline to June 12, 2025.

On February 13, 2025, the Parties reached an agreement in principle to resolve all disputed issues in this proceeding.

On February 25, 2025, the Parties noticed a settlement conference to be held on March 10, 2025.

II. SUMMARY OF PARTIES' LITIGATION POSITIONS

A. Nevada County's Position

The County's litigation position is that PG&E failed to meet the local government consultation requirements in GO 177, Rule VII.B, disregarded feedback from County staff regarding Hell's Half Acre, and thereby destroyed an important local wildflower habitat. The County requested that the Commission order PG&E to restore the majority of the Hell's Half Acre site, adopt improved coordination protocols with County staff to avoid similar incidents in the future, and dedicate a conservation easement to a local nonprofit to offset the damage done to

Hell's Half Acre.

B. PG&E's Position

PG&E's litigation position is that it conducted adequate consultation with County staff during the process of planning the LNG injection project. PG&E also asserts that it in fact took the County's concerns about the wildflower habitat at Hell's Half Acre into consideration and, where appropriate, incorporated the County's suggestions into project planning and design. PG&E asserts that, even if all facts alleged in the County's complaint are taken as true, the County has failed to establish any violation of law.

III. SUMMARY OF THE SETTLEMENT TERMS AND CONDITIONS

A. Restoration of Hell's Half Acre

The Parties agree that PG&E will restore the portions of Hell's Half Acre not occupied by the LNG injection site and access roads in accordance with the provisions of the Restoration and Mitigation Monitoring Plan and Final Integrated Vegetation Management Plan that PG&E developed in coordination with local stakeholders following its installation of the LNG injection site. The goal of the Restoration and Mitigation Monitoring Plan, which covers the three-year period from 2024–2026, is to reestablish locally occurring native vegetation within the restoration area and suppress growth and spread of invasive species at the project site. PG&E has contracted with a qualified Restoration Ecologist to oversee the restoration and monitoring work. The intent of the Final Integrated Vegetation Management Plan is to maintain the site to ensure safe and reliable operation of the LNG injection facility while enhancing the restoration area, including benefits to habitat for wildlife and native plants. Both plans are included in their entirety as exhibits to the Settlement Agreement.

B. Communication and Coordination with County Staff

The Parties have agreed on an Improved Consultation Protocol intended to enhance

communication and coordination between County staff and PG&E regarding infrastructure projects located in the County that meet the agreed-upon criteria: (1) projects undergoing environmental review under the California Environmental Quality Act (CEQA) or National Environmental Protection act (NEPA); (2) projects with one acre of contiguous vegetation removal or ground disturbance that are not undergoing CEQA or NEPA review (other than standard electric vegetation management work); and (3) projects for which PG&E requests an Encroachment Permit from the County and that include road closures, weekend work, and/or night work. The Protocol specifies types of information, coordination, or both, that PG&E is required to provide to County staff for each type of project. The Protocol will remain in place for a five-year term, and the Parties agree to confer annually to discuss whether any modifications to the Protocol is necessary. The complete terms of the Improved Consultation Protocol are included in the Settlement Agreement.

C. Conservation Easement and Funding

The Parties agree that PG&E will record a conservation easement over the portion of 14-acre Hell's Half Acre site not occupied by the LNG injection site and access roads, and that PG&E will donate the conservation easement to the Bear Yuba Land Trust (BYLT), a nonprofit organization whose purpose is to promote conservation of the region's natural, historical, and agricultural resources. PG&E will donate a \$200,000 endowment to BYLT for stewardship of the conservation easement. PG&E will additionally make a \$250,000 donation to BYLT's Wildflower Ridge Preserve endowment fund. The Wildflower Ridge Preserve, which occupies 128 acres located directly across the street from Hell's Half Acre, was established in 2023.¹

¹ See <https://www.bylt.org/land/wildflower-ridge-preserve/>.

IV. THE COMMISSION SHOULD ADOPT THE SETTLEMENT AGREEMENT

A. Legal Standard for Settlements

The Commission will not approve settlements, whether contested or uncontested, unless the settlement is reasonable in light of the whole record, consistent with law, and in the public interest.² In light of the strong policy favoring settlements, the Commission approves settlement agreements based on whether the settlement is just and reasonable as a whole, not based on its individual terms.³

B. Commission Policy Favors Settlements

The Commission has a history of supporting settlements if they are fair and reasonable in light of the whole record.⁴ As the Commission has reiterated over the years, it “favors settlement because they generally support worthwhile goals, including reducing the expense of litigation, conserving scarce Commission resources, and allowing parties to reduce the risk that litigation will produce unacceptable results.”⁵ The strong public policy favoring settlements weighs in favor of the Commission approving the Settlement Agreement without altering the results of the negotiation process.⁶

C. The Settlement Agreement is Reasonable in Light of the Whole Record

The Commission should find that the Settlement Agreement is reasonable in light of the

² Rule of Practice and Procedure 12.1(d).

³ See, e.g., D.10-04-033, p. 9.

⁴ See, e.g., D.05-03-022, pp. 7–8 (citing D.88-12-083 [30 CPUC 2d 189, 221–223]; D.91-05-029 [40 CPUC 2d 301, 326]).

⁵ See, e.g., D.10-12-035, p. 58; D.05-03-022, p. 8. See also D.10-12-051, p. 8 (stating that Commission decisions “express the strong public policy favoring settlement of disputes if they are fair and reasonable”); D.10-11-035, p. 12 (citing the policy favoring settlements, which “reduces litigation expenses, conserves scarce Commission resources, and allows parties to craft their own solutions reducing the risk of unacceptable outcomes if litigated.”).

⁶ See generally, D.05-03-022, pp. 7–13; D.14-12-040, p. 15.

whole record and approve it without change. The record contains discussion of the relevant facts by both Parties, submitted in their verified filings. Before reaching settlement, the Parties held a number of settlement discussions by videoconference and exchanged written proposals. The Settlement Agreement represents reasonable compromises developed after careful review and extensive discussion by the Parties; it was reached only after significant give-and-take through arms-length negotiations, and after each party had made concessions to resolve issues in a matter that reflects a reasonable compromise of their litigation positions. In its totality, the Settlement Agreement reflects a reasonable balance of the interests implicated in this proceeding.

The verified Complaint and Answer, the Settlement Agreement and its supporting exhibits, and this motion contain sufficient information for the Commission to judge the reasonableness of the Settlement Agreement.

D. The Settlement Agreement is Consistent with Law

The Settlement Agreement is consistent with current law, as it does not contravene any applicable statute, General Order, Commission Rule, or prior Commission decision.

E. The Settlement Agreement is in the Public Interest

The Settlement Agreement is in the public interest. The purpose of the County's Complaint was to seek redress for the impacts to Hell's Half Acre resulting from the LNG injection facility and to improve coordination between County staff and PG&E such that future incidents related to other infrastructure projects could be avoided. The Settlement Agreement provides for site restoration, improved County-PG&E coordination, and long-term protection for local wildflower habitat, as well as ensures that PG&E is able to operate the LNG injection facility safely and can conduct future infrastructure projects in Nevada County in a safe and effective manner. These outcomes all further the public interest.

The Settlement Agreement is a reasonable compromise of the Parties' respective

positions and is in the interest of the public and PG&E's customers. If approved, the Settlement Agreement will avoid the time, expense, and uncertainty of litigating the issues raised in this proceeding.⁷

V. CONCLUSION

For the reasons set forth above, the Parties respectfully request that the Commission:

1. Find the Settlement Agreement to be reasonable in light of the whole record, consistent with law, and in the public interest;
2. Adopt the Settlement Agreement without modification; and
3. Grant such other relief as is necessary and proper.

Respectfully submitted March 17, 2025, at San Francisco, California

PACIFIC GAS AND ELECTRIC
COMPANY

DOWNEY BRAND, LLP

By: /s/ Erica J. Schlemer
ERICA J. SCHLEMER
DAVID KRASKA
Pacific Gas and Electric Company
300 Lakeside Drive
Oakland, California 94612
Telephone: (415) 722-1851
Email: david.kraska@pge.com
erica.schlemer@pge.com

By: /s/ Megan J. Somogyi
MEGAN J. SOMOGYI
CHRISTOPHER MARELICH
455 Market Street, Suite 1500
San Francisco, California 94105
Telephone: 415.848.4800
Email: msomogyi@downeybrand.com
cmarelich@downeybrand.com

Attorneys for Pacific Gas and Electric
Company

Attorneys for County of Nevada

⁷ See, e.g., D.13-11-003, p. 8; D.13-12-045, p. 12.

ATTACHMENT A

California Public Utilities Commission Complaint No. 23-12-020
County of Nevada v. Pacific Gas and Electric Company

**SETTLEMENT AGREEMENT BETWEEN COUNTY OF NEVADA AND PACIFIC GAS
AND ELECTRIC COMPANY (U 39 E)**

In accordance with Article 12 of the Commission's Rules of Practice and Procedure, the County of Nevada and Pacific Gas and Electric Company (collectively, the Parties) enter into this Settlement Agreement as a compromise of their respective litigation positions to resolve all of the disputed issues in the above-captioned proceeding.

I. PROCEDURAL HISTORY

Nevada County filed C.23-12-020 on December 12, 2023. The complaint alleged that PG&E violated Section VII.B of General Order 177, which requires utilities to consult with local agencies regarding land use matters when locating gas facilities. The complaint alleged that PG&E failed to meet that requirement in the course of acquiring a parcel of land and installing a liquefied natural gas injection station, which resulted in significant impacts to a well-known local landmark commonly referred to as "Hell's Half Acre."

PG&E filed its Answer on February 29, 2024. The Answer took the position that PG&E conducted adequate consultation with the County in the course of planning and installing the injection station, and that, while the consultation did not yield the results the County wished for, PG&E's actions did not constitute a breach of General Order 177, Section VII.B.

Shortly after PG&E filed its Answer, the Parties began settlement discussions.

A prehearing conference was held on March 26, 2024. The Parties reported that settlement discussions were underway and had been productive, but that the Parties were not yet in a position to reach an agreement in principle.

On May 7, 2024, the Assigned Commissioner's Scoping Memo and Ruling was issued. The Scoping Ruling noted the Parties' commitment to file a joint settlement status report by

May 10, and set a status conference for June 7.

The Parties filed a joint settlement status report on May 10, 2024. The report noted that settlement discussions were ongoing and productive, but that it was not clear whether the Parties could reach an agreement in principle before the June 7 status conference. The Parties stated their intention to continue settlement discussions and provide an update at the status conference.

On June 6, 2024, the Administrative Law Judge issued a ruling granting the Parties an additional 60 days to continue settlement discussions and directing that the Parties submit another status report by August 23.

On August 23, 2024, the Parties filed their second joint status report, which stated that settlement discussions continued to be productive and were likely to result in a complete resolution of the dispute. Because the parties had not been able to finalize the terms of an agreement in principle by the status report due date, they committed to continuing the settlement process and providing any further updates as directed.

On October 23, 2024, the Administrative Law Judge issued an email to the Parties and service list noting that the statutory deadline was fast approaching and directing the Parties to inform her of their intentions regarding resolution of the proceeding. On October 24, the Parties informed the Administrative Law Judge by email that they intended to file a joint motion for a six-month extension of the statutory deadline, which would be followed by a settlement agreement and accompanying motion for approval.

On November 6, 2024, the Parties filed the joint motion requesting an order extending the statutory deadline to June 12, 2025.

On February 13, 2025, the Parties reached an agreement in principle to resolve all disputed issues in this proceeding.

On February 25, 2025, the Parties noticed a settlement conference to be held on March 10, 2025.

II. SETTLEMENT TERMS AND CONDITIONS

The Parties agree to the following terms and conditions as a complete and final resolution of all issues in C.23-12-020:

2.1 Restoration of Hell's Half Acre

The Parties agree that PG&E will restore the portions of Hell's Half Acre not occupied by the LNG injection site and access roads. PG&E will undertake this restoration in accordance with the provisions of the Restoration and Mitigation Monitoring Plan and Final Integrated Vegetation Management Plan attached as Exhibits A and B, respectively, to this Settlement Agreement.

2.2 Communication and Coordination with County Staff

The Parties agree to abide by the terms of the Improved Consultation Protocol set forth below:

2.2.1 Beginning 30 days after execution of this Agreement and extending for five years thereafter, unless subsequently modified by written agreement of the Parties, the following PG&E gas and electric projects proposed to be sited within the County shall be subject to the applicable requirements set forth in this Section 2: (1) projects undergoing environmental review under CEQA or NEPA; (2) projects with one acre of contiguous vegetation removal or ground disturbance that are not going through CEQA or NEPA review, other than Standard Electric Vegetation Management Work; and (3) projects for which PG&E requests an Encroachment Permit from the County and which include road closures, weekend work, and/or night work.

2.2.2 Projects undergoing environmental review under CEQA or NEPA are subject to the following specific consultation requirements:

2.2.2.1 PG&E shall identify for the County the CEQA and/or NEPA lead agency for the project.

2.2.2.2 PG&E shall provide the County with the following environmental review documentation, where available: (a) biological resources constraints report; (b) cultural resources constraints report; (c) wetlands delineation; and (d) biological survey reports.

2.2.2.3 PG&E shall provide the County with a link to the project's SWPPP, where applicable.

2.2.2.4 PG&E shall identify for the County any required County ministerial permits.

2.2.2.5 PG&E shall offer to conduct a project-specific meeting to discuss the proposed project and obtain the County's feedback.

2.2.3 Projects with one acre of contiguous vegetation removal or ground disturbance that are not going through CEQA or NEPA review are subject to the following specific consultation requirements:

2.2.3.1 PG&E shall provide the County with an explanation of why the project is not undergoing CEQA or NEPA review.

2.2.3.2 PG&E shall provide the County with the following environmental review documentation, where available: (a) biological resources constraints report; (b) cultural resources constraints report; (c) wetlands delineation; and (d) biological survey reports.

2.2.3.4 For projects for which the environmental review documentation listed in Section 2.2.3.2 have not been developed, PG&E shall provide the County with: (a) a list of environmental resources reviewed by PG&E's environmental lead for the project and a summary of the results of those reviews; and (b) the environmental protections measures and BMPs prescribed for the project.

2.2.3.5 PG&E shall provide the County with a link to the projects' SWPPP, where applicable.

2.2.3.6 PG&E shall identify for the County any required local ministerial permits.

2.2.3.7 PG&E shall offer to conduct a project-specific meeting to discuss the proposed project and obtain the County's feedback.

2.2.3.8 Notwithstanding any other provision herein, the requirements of this Section 2.2.3 shall not apply to Standard Electric Vegetation Management Work. Standard Electric Vegetation Management Work is defined as PG&E's vegetation management work conducted in compliance with Commission guidelines and requirements, state or federal regulations and which does not require state or federal environmental resource permits. Standard Electric Vegetation Management Work may include tree work to maintain clearances on PG&E's electric distribution and transmission facilities, removal of hazard trees, and defensible space work, as well as the management of wood and debris resulting from such compliance-driven work.

2.2.4 Projects for which PG&E requests an Encroachment Permit from the County and which include road closures, weekend work, and/or night work are subject to the following specific consultation requirements (in addition to any requirements that apply to the project under Sections 2.2.2 or 2.2.3):

2.2.4.1 PG&E shall provide the County with the environmental protection measures and BMPs prescribed for the project.

2.2.4.2 PG&E shall provide the County with the site plan information, including construction drawings.

2.2.4.3 To the extent a project subject to this Section 2.2.4 is also covered by Sections 2.2.2 or 2.2.3, PG&E shall include with its Encroachment Permit application a reference to any environmental review documentation provided thereunder.

2.2.5 PG&E shall provide the County with a Point of Contact (POC) from PG&E's Land, Environmental, and Permitting Services organization for projects subject to this Section 2.2 who is familiar with PG&E work occurring within the County.

2.2.6 PG&E and the County shall hold quarterly meetings to discuss projects subject to the requirements of this Section 2.2.

2.2.6.1 Quarterly meeting attendees shall include, at a minimum, the County's designated representative and PG&E's POC.

2.2.6.2 The parties will exchange a list of projects to be specifically discussed two weeks before the date of each quarterly meeting to ensure that the appropriate project team members and subject matter experts can

attend.

2.2.7 The parties will confer annually during the first quarterly meeting of each calendar year to determine whether any modifications to the consultation protocols are necessary.

2.3 Conservation Easement and Funding

The Parties agree that PG&E will record a conservation easement over the portion of the 14-acre Hell's Half Acre site that is not occupied by the LNG injection site and access roads; PG&E will donate the conservation easement to the Bear Yuba Land Trust (BYLT), a nonprofit organization whose purpose is to promote conservation of the region's natural, historical, and agricultural resources. PG&E will donate a \$200,000 endowment to BYLT for stewardship of the conservation easement. PG&E will additionally make a \$250,000 donation to BYLT's Wildflower Ridge Preserve endowment fund.

III. GENERAL PROVISIONS

3.1. This Settlement Agreement embodies the entire understanding and agreement of the Parties with respect to the matters described, and it supersedes any prior oral or written agreements, principles, negotiations, statements, representations, or understandings among the Parties with respect to these matters.

3.2 In executing this Settlement Agreement, each Settling Party declares and mutually agrees that the terms and conditions are reasonable in light of the whole record, consistent with law, and in the public interest.

3.3 In accordance with Rule 12.5, the Parties intend that Commission adoption of this Settlement Agreement will be binding on the Parties, including their legal successors, assigns, partners, members, agents, parent or subsidiary companies,

affiliates, officers, directors, and/or employees. Unless the Commission expressly provides otherwise, and except as otherwise expressly provided herein, such adoption does not constitute approval or precedent for any principle or issue in this or any future proceeding.

- 3.4** This Settlement Agreement represents a negotiated compromise among the Parties' respective litigation positions on the matters described, and the Parties have assented to the terms of this Settlement Agreement only to arrive at the agreement embodied herein. Nothing contained in this Settlement Agreement should be considered an admission of, acceptance of, agreement to, or endorsement of any disputed fact, principle, or position previously presented by either of the Parties on these matters in this proceeding.
- 3.5** The Parties agree that this Settlement Agreement is subject to approval by the Commission. As soon as practicable after the Parties have signed this Settlement Agreement, the Parties intend to file a joint motion for Commission approval and adoption of this Settlement Agreement. The Parties will furnish such additional information, documents, and/or testimony as the ALJ or the Commission may require in connection with its review of the motion for approval of this Settlement Agreement.
- 3.6** The Parties agree to support the Settlement Agreement and use their best efforts to secure Commission approval of the Settlement Agreement in its entirety without modification.
- 3.7** The Parties agree to actively and mutually defend the Settlement Agreement if the adoption is opposed by any other party.

3.8 The Parties agree that, if the Commission fails to adopt this Settlement Agreement in its entirety and without modification, the Parties will convene a settlement conference within 15 days thereof to discuss whether they can resolve the issues raised by the Commission's actions. If the parties cannot mutually agree to resolve the issues raised by the Commission's actions, the Settlement Agreement will be rescinded, and the Parties will be released from their obligation to support the Settlement Agreement. Thereafter, the Parties may pursue any action they deem appropriate but agree to cooperate in establishing a procedural schedule.

IV. MISCELLANEOUS PROVISIONS

- 4.1** The Parties agree that nothing contained in this Settlement Agreement is to be construed as an admission of liability, fault, or improper action by any Party.
- 4.2** The Parties agree that no signatory to the Settlement Agreement or any employee thereof assumes any personal liability as a result of the Settlement Agreement.
- 4.3** If any Party fails to perform its respective obligations under the Settlement Agreement, the other Party may come before the Commission to pursue a remedy including enforcement.
- 4.4** The provisions of this Settlement Agreement are not severable. If the Commission, or any competent court of jurisdiction, overrules or modifies as legally invalid any material provision of the Settlement Agreement, the Settlement Agreement may be considered rescinded as of the date such ruling or modification becomes final, at the discretion of the Parties.
- 4.5** The Parties acknowledge and stipulate that they are agreeing to this Settlement Agreement freely, voluntarily, and without any fraud, duress, or undue influence by any other party. Each party states that it has read and fully understands its

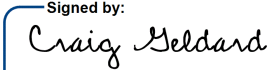
rights, privileges, and duties under the Settlement Agreement, including each Party's right to discuss the Settlement Agreement with its legal counsel and has exercised those rights, privileges, and duties to the extent deemed necessary.

- 4.6** Neither Party has relied, or presently relies, upon any statement, promise, or representation by the other Party, whether oral or written, except as specifically set forth in this Settlement Agreement. Each Party expressly assumes the risk of any mistake of law or fact made by such Party or its authorized representative.
- 4.7** This Settlement Agreement may be executed in separate counterparts by the Parties with the same effect as if both Parties had signed one and the same document. All such counterparts will be deemed to be an original and shall together constitute one and the same Settlement Agreement.
- 4.8** This Settlement Agreement will become effective and binding on the Parties as of the date it is signed by both Parties.
- 4.9** This Settlement agreement will be governed by the laws of the State of California as to all matters, including but not limited to matters of validity, construction, effect, performance, and remedies.

V. CONCLUSION

The Parties mutually believe that, based on the terms and conditions stated above, this Settlement Agreement is reasonable in light of the whole record, consistent with the law, and in the public interest. The Parties' authorized representatives have duly executed this Settlement Agreement on behalf of the Party they represent.

PACIFIC GAS AND ELECTRIC
COMPANY

By: 
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Craig Geldard
Senior Manager, Environmental
Management
Date: 3/14/2025

COUNTY OF NEVADA

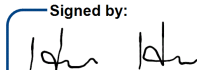
By: 
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Heidi Hall
Chair, Nevada County Board of Supervisors
Date: 3/17/2025

EXHIBIT A

Restoration and Mitigation Monitoring Plan

RESTORATION AND MITIGATION AND MONITORING PLAN FOR PACIFIC GAS & ELECTRIC COMPANY'S I-194D PROJECT

PREPARED FOR:

Pacific Gas & Electric Company
Contact: Lindsey Koos and
Jordan McKay
Phone: 925-983-9023

PREPARED BY:

Kleinfelder
3130 Kilgore Road, Suite 200
Rancho Cordova, California 95670
Contact: Susan Dewar



***Pacific Gas and
Electric Company®***

March 2024

Pacific Gas and Electric Company (PG&E). 2024. *Restoration and Mitigation and Monitoring Plan for Pacific Gas and Electric Company's I-194D Project*. March 2024. Grass Valley, California. Prepared by Kleinfelder, Rancho Cordova, California.

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I-194D Project Restoration and Mitigation and Monitoring Plan

I. Introduction

This Restoration and Mitigation and Monitoring Plan (Plan) has been prepared to facilitate native species revegetation on a disturbed parcel associated with a recently constructed liquified natural gas (LNG) facility in Nevada County, California. The project site is accessed off Adam Avenue near the intersection of Ridge Road and Rough and Ready Highway west of Grass Valley (Figure 1).

A. Site Description

The project site, an approximately 14-acre parcel owned by Pacific Gas & Electric Company (PG&E), is part of a feature known locally as “Hell’s Half Acre”. Hell’s Half Acre is a botanically and geologically unique habitat (lava cap [Saucedo and Wagner 1992, Callahan and Buck-Diaz 2016]). Shallow soils are underlain by volcanic mudflow (NRCS 2023, Saucedo and Wagner 1992). The shallow soils and seasonally varied soil hydrology created a diverse floristic community of native plants within microhabitats across the site. Floral lists compiled by the California Native Plant Society (CNPS) Redbud Chapter for the Hell’s Half Acre site, including the approximately 26 acres to the west and the project site, and project-specific surveys have documented 270 plant species including 203 native species and 67 non-native species (Appendix B). Not all of these species occurred on the PG&E project site; however, this list provides a baseline of potential species for seed collection and propagation, and a list of non-native species that may become species of management concern.

Hell’s Half Acre is a unique and valued habitat; however, it has experienced degradation in the past and was not a pristine site. According to the Yuba River Charter School Final Mitigated Negative Declaration published in 2015, this site “...is currently threatened and degraded by off-road vehicles (OHV) and trash dumping.” According to the Kenny Ranch Biological Inventory McGinnis 1994, “...there are numerous small dump sites throughout these areas, ranging from old cars to... small lichen-covered boulders which occasionally (are) stolen, presumably for home landscaping. This process appears to entail dragging them from their embedded position, possibly by a chain attached to a four wheel drive vehicles. This not only reduces the number of natural landscape features but usually destroys several square yards of wildflower habitat for each boulder taken.... Perhaps the most continuous source of habitat destruction is the disturbance of the fragile light soil layer by off road vehicles.... Unfortunately, not all soil surface disruption is confined to trespass situations. During the course of the 1994 survey, a bulldozer operator, engaged in a rather haphazard job of trail clearing, consistently used wildflower bloom areas as turn around sites...”

In 2023, PG&E purchased the 14-acre project site to construct a gas transmission station. This construction resulted in the clearing of woody vegetation with heavy equipment across the entire project site and grading of approximately 8.3 acres of the project site, approximately 3.5 acres of which is now the LNG facility and appurtenant features. As of October 2023, the 3.5 developed acres include a fenced gravel-surfaced pad, gravel access road, and an earthen retention basin. The remaining portion of the project site, approximately 10.5 acres, is either partially disturbed (trees removed with stumps remaining, some soil churned/rutting but predominantly vegetated) or disturbed (bare soil).

Disturbed areas have been stabilized with a sterile Bonded Fiber Matrix (BFM) erosion control product (wood fiber with organic-base tackifier). Excluding facility and asset setback areas within this 10.5 acres of partially disturbed or disturbed bare soil is 5.7 acres hereinafter referred to as the “restoration area” (Figure 2).

The level of recent disturbance varies across the restoration area. There are relatively intact soil areas around the perimeter of the parcel to the south, west, and north sides of the LNG facility (Appendix A Photos 1-4). The area to the south of the new access road, off Adam Avenue, was completely cleared of vegetation and graded; however, salvaged topsoil was replaced within this portion of the site and is expected to hold native seedbank (Photo 5). The northeast corner of the site was cleared and graded; topsoil was not salvaged or segregated from subsoil material (Photo 6). Many of the black oaks (*Quercus kelloggii*) and live oaks (*Quercus wislizenii* and/or *Q. chrysolepis*) on the site are resprouting (Photo 7). Additionally, many native shrubs and tree seedlings are present within the intact soil areas including but not limited to manzanita (*Arctostaphylos* spp.), yerba santa (*Eriodictyon californicum*), poison oak (*Toxicodendron diversilobum*), deerbrush (*Ceanothus integerrimus*), coffee berry (*Frangula californica*), Pratten’s buckwheat (*Eriogonum prattenianum* var. *prattenianum*), honeysuckle (*Lonicera* spp.), and evergreen buckthorn (*Rhamnus ilicifolia*) (Photo 8). Several invasive weed species of management concern (CAL-IPC list 2024) are either currently present within the restoration area or have been documented in past floristic lists. Manual removal (hand pulling/digging) of three non-native invasive species (Scotch broom [*Cytisus scoparius*], pokeweed [*Phytolacca americana*], and tree-of-heaven [*Ailanthus altissima*]) occurred October 2023 and prior to PG&E purchasing the property.

B. Project Goals

The goals of this Plan are to:

1. Reestablish locally occurring native vegetation within the 5.7-acre restoration area within the project site, and
2. Suppress growth and spread of invasive species at the project site.

Execution of this Plan is expected to result in the creation of a stable, early-successional native plant community within the restoration area that will include a mix of locally sourced native trees, shrubs, and herbaceous plants to replace the vegetation that was removed during construction of the LNG facility.

C. Responsible Parties

1. Pacific Gas & Electric Company

PG&E is the owner/operator and is responsible for the restoration and monitoring outlined in this Plan. PG&E will contract with a Restoration Contractor (RC) team to implement onsite habitat restoration activities, including planting and maintenance work. PG&E will also contract with a Restoration Ecologist (RE) to oversee the habitat restoration work and conduct monitoring and reporting. PG&E will have final review and acceptance of all work on the project.

2. Restoration Contractors

PG&E will contract a team of qualified RCs. The RCs will implement the Plan and perform restoration and revegetation activities appropriately to achieve success standards identified within this Plan. The RC team may be comprised of multiple qualified contractors and vendors performing specific tasks such as onsite seed collection, seed bulking, container plant production, restoration site installation, maintenance including weed management, and annual monitoring of the site. Single RC may be selected to conduct multiple tasks, or more than one RC may be needed per task, if that RC has the appropriate qualifications for those roles. All RCs must be approved PG&E contractors at the time they are contracted for work. Below are the currently identified RCs and relevant qualification:

a. Seed and Plant Materials Contractor:

Must have experience with collection and/or propagation of native California species and be listed on the California Native Plant Society (CNPS) Calscape website (<https://calscape.org/nurseries.php>).

b. Container Plants Production Vendor:

A reputable native plant nursery utilizing the most current industry standard best management practices for producing container stock free of *Phytophthora* and other soilborne diseases.

c. Restoration Site Installation Vendor:

The minimum qualification for the vendor chosen to conduct the installation will include specializing in ecological restoration as demonstrated by operation in California on habitat restoration projects. All installation work will be guided and overseen by the RE.

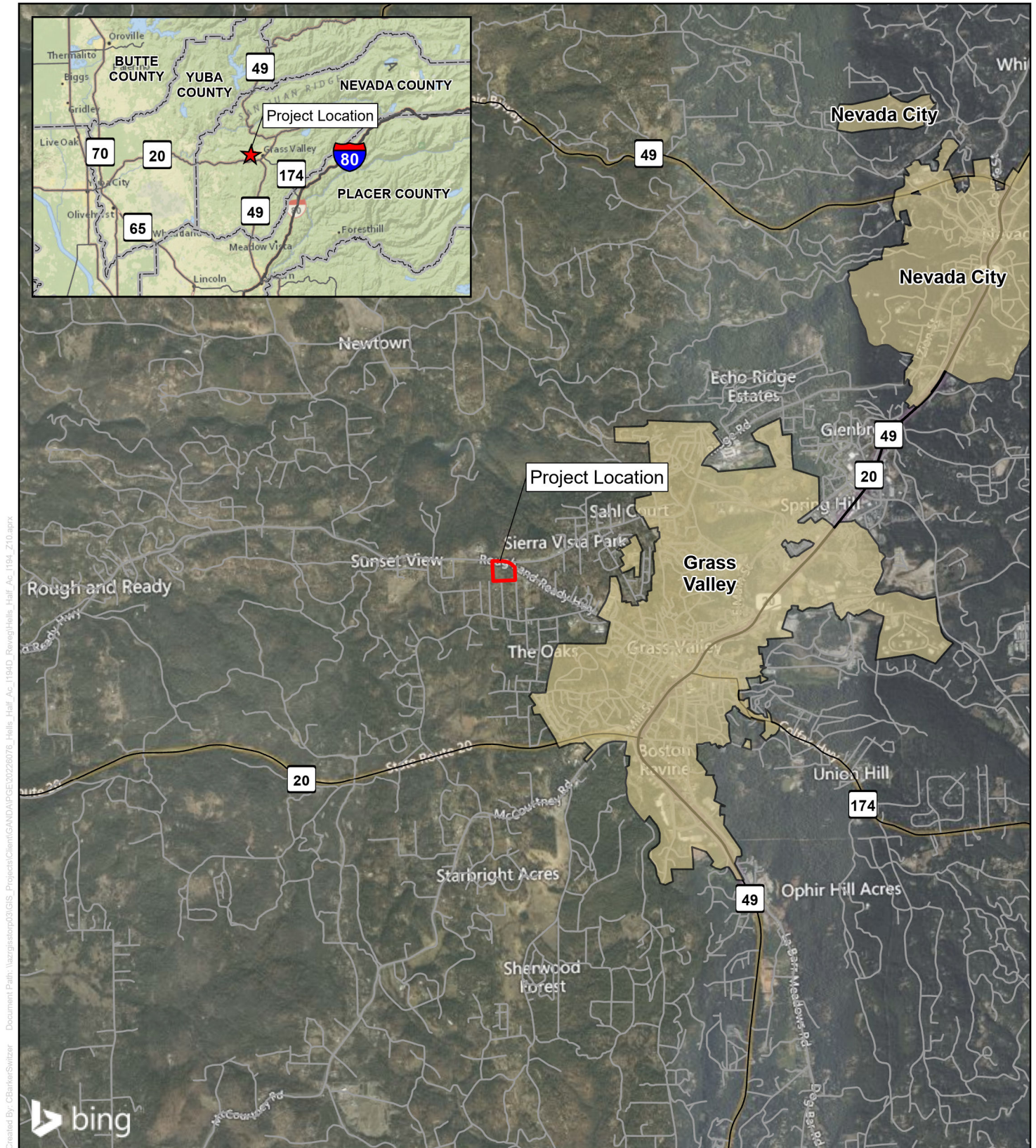
d. Weed Control Contractor:

Pesticide Control Advisor (PCA) with experience working in sensitive habitats and with the target species that are known to occur onsite and have familiarity with potential new invasive species that may be found onsite.

3. Restoration Ecologist

PG&E has contracted a qualified Restoration Ecologist (RE). Minimum qualifications for the RE include: 1) degree (bachelor's or higher) in restoration ecology or closely related field (plant biology, botany, ecology, forestry, biology); alternatively, five years of relevant experience in California. The RE will assist PG&E by monitoring implementation of the propagation, restoration, and maintenance activities. The RE is also responsible for providing restoration monitoring and recommending remedial measures necessary to achieve onsite restoration success as described in this Plan. The RE may be assisted by or delegate tasks such as vegetation monitoring to a qualified Botanist and/or Biologist. Minimum qualifications for the Botanist and/or Biologist include: 1) degree (bachelor's or higher) in restoration botany or closely related field (plant biology, ecology, forestry, biology); alternatively, three years of relevant experience in California.

Though not currently anticipated, should the current RE depart the project, PG&E will contract a replacement RE with the previously listed qualifications.



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Source: Bing Maps

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1 inch = 1 mile

Figure 1: Regional Vicinity
I-194D Project Revegetation
and Monitoring Plan
Nevada County, California



II. Revegetation Approach

This Plan presents a three-year approach to restoring the restoration area. The following actions are proposed to replace the native vegetation removed during construction and to ensure the site is on a trajectory toward recovery.

A. Existing Conditions

The restoration area has been classified into three categories based on conditions as of December 2023 and anticipated capacity for natural recovery: 1) maintenance zones, 2) passive restoration zones, and 3) active restoration zones (Figure 2). Zone mapping occurred in the field on December 12, 2023 by the current RE. Professional judgement and visual site conditions, such as presence of intact or resprouting vegetation, soil surface conditions, were used to classify restoration zones. Zones were recorded with a handheld global positioning system (GPS) unit capable of 1 to 3-meter accuracy. Requirements for zones are described below.

1. Maintenance Zones

Maintenance zones include areas that have an intact seedbank and which were showing signs of resprouting/recovery in the fall of 2023 or are reclassified during annual monitoring. These areas are not expected to require additional seeding or planting, but they will receive maintenance through the treatment of target invasive weeds and protection of native volunteer seedlings/resprouts. Maintenance zones will also be subject to annual monitoring and reporting.

2. Passive Restoration Zones

Passive restoration zones include areas that have the native topsoil or may contain potential native seedbank, as evidenced by native resprouting plants in fall of 2023, that may not require additional seeding or planting. These areas will require monitoring to determine the potential for natural recovery. Passive restoration zones will require treatment of target weeds. Passive restoration zones will also be subject to annual monitoring and reporting.

Passive restoration zones will be assessed for reclassification in spring of 2024 into either active restoration or maintenance zones.

The assessment will look at the following criteria:

1. Native stem recruitment greater than or equal to 250 stems per acre, OR
2. Absolute cover of native species greater than or equal to 20 percent AND relative cover of non-native species no greater than non-native cover from maintenance zone.

If assessment identifies an area that meets one or both criteria, the area will be reclassified as a maintenance zone.

If assessment identifies an area that meets neither criterion, the area will be reclassified as an active restoration zone.

3. Active Restoration Zones

Active restoration zones include areas that are not expected to contain sufficient seedbank to recover without seeding and/or planting of container stock or have been identified in the 2024 spring assessment to not be recovering. These areas will be most susceptible to weed invasion due to the level of soil disturbance.

Plant palettes will be developed based on local seed sourced in the 2024 growing season.

Active zones will be evaluated during annual monitoring (methods described below). If vegetation sampling of active restoration zones meets one or both criteria below, the area will be reclassified as a maintenance zone:

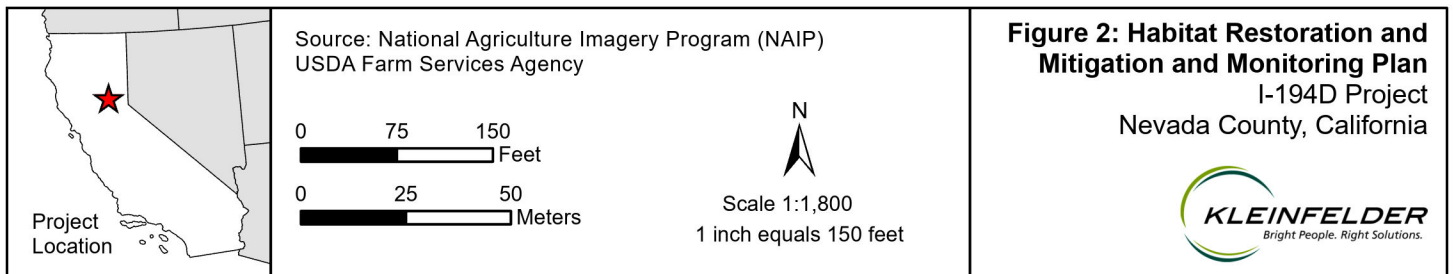
1. Native stem recruitment (including survival of container plants) greater than or equal to 250 stems per acre, OR
2. Absolute cover of native species greater than or equal to 20 percent AND relative cover of non-native species no greater than non-native cover from maintenance zone.

If assessment identifies an area that meets one or both criteria, the area will be reclassified as a maintenance zone.

If assessment identifies an area that meets neither criterion, the area will remain classified as an active restoration zone.

4. PG&E Facility and Asset Setback Areas

Facility and asset setback areas will not receive active restoration (seeding or planting) and will not be monitored due to work that must occur within these zones to reduce the risk of fire and maintain the safety of gas facilities in the event of a fire. PG&E implements defensible space standards in and around certain PG&E owned gas facilities, including the station on the project site. Because PG&E must manage vegetation growth within required defensible space setbacks, no container plants will be installed within 100 feet of the station fence line or within 30 feet of underground pipelines and no seed of woody perennial species will be applied in either of these areas. Seed of annual or herbaceous perennials may be applied between 30-100 feet of the LNG fence line or within the pipeline setback area if excess quantities are available and are not needed in other active restoration areas.



III. 2024 Project Activities

A. Baseline Vegetation Monitoring

Vegetation monitoring will be conducted by the RE and/or qualified Botanist/Biologist in late spring 2024 to assess the baseline condition of the reference site.

1. Reference Site

The reference site will be utilized to determine an estimate of pre-disturbance native species cover. The reference site will be established in one of the following ways. Offsite: PG&E will survey in the right of way of the BRUNSWICK 1110 electric distribution line on the adjacent parcel to the west of PG&E's owned project site, within PG&E's BRUNSWICK 1110 electric distribution right of way. Onsite: If landowner permission cannot be reasonably acquired, the reference site will be established on the southern portion of the restoration area, which is currently classified as a maintenance zone (Figure 2).

If an onsite reference site is utilized, woody native perennial absolute cover at the site of 31% (trees and shrubs) will be used, which results from an analysis of aerial imagery (National Agricultural Imagery Program [NAIP]) from prior to project disturbance. Sampling within the herbaceous component of the site will be used to estimate the remaining pre-disturbance for non-woody cover. Since the maintenance areas were subject to some limited disturbance (vehicular access, soil rutting/churning) during tree cutting, an adjustment will be made to the resultant native versus non-native cover to account for any advantage to non-native species over the previous growing season (native cover will be increased by 10% of measured absolute herbaceous cover and non-native cover will be reduced by 10%).

See Appendix D for an example data table and analysis.

2. Monitoring Methods

The monitoring is anticipated to occur in May or June 2024 based on rainfall and average daily temperature and the anticipated phenology of the plants in the restoration area, as determined by the professional judgement of the RE.

Sampling within the reference site will take place along a minimum of two 100-meter belt transects (or equivalent length of shorter transects if space is insufficient). A minimum of two 100-meter transects (or additional shorter transects equivalent in length) will also be placed within the active and passive restoration zones within areas deemed by the RE to be representative (see proposed transects in Figure 2). Though the intent will be to maintain permanent locations of restoration transects, depending on how the site restoration and regrowth progresses, transects may need to be adjusted or additional transects added to capture unforeseen variation. Transect locations will be determined by the professional judgement of the RE in areas that are representative of the reference site. Transect start and end points will be marked in the field with t-posts or pin flags unless reference site is within PG&E's BRUNSWICK 1110 electric distribution right of way (in which case site will be recorded with GPS and photographs of landmarks to aid relocation, if needed).

Woody stems (including live or dead stumps) will be recorded within 1-meter on either side of the transect (2-meter total width) to provide an estimate of stem density. Herbaceous species (and cover) will be sampled within 1-meter quadrats every 10-meters along the transect, alternating sides of the transect.

B. Photo Documentation

Photographic documentation will be taken annually at predetermined, set, and marked locations. Locations will be determined by the RE to obtain photo points which maximize site coverage.

C. Seed Management

1. Collection

Seed or other propagules (such as cuttings, if available) will be collected by a qualified vendor(s) within the project site. PG&E will also spend reasonable efforts to obtain owner permission to collect seed or other propagules at the parcel located directly west of the project site within the right of way for the BRUNSWICK 1110 electric distribution line. Seed or other propagules will be collected in no less than three collection periods between approximately April through August in 2024. Timing of seed collection is imperative to the quality of seed and is influenced by the maturity of the fruit at the time of collection. Fruit maturity will be monitored ahead of and throughout the collection season (April through August in 2024) by the qualified vendor to ensure collection timing is optimized and seeds are processed and stored appropriately prior to seeding. Timing of collections will be based on the species available, bloom period, and seed maturation and will be determined by PG&E and the RE in consultation with the qualified vendor(s).

Seed will be collected in such a manner as to not damage the parent plants of perennial/shrub species (except for collection of cuttings for container plant production). Only seeds (or fruit) that are ripe and readily detach from the plant will be collected.

2. Storage

The seeds of many native plants can lose their viability quickly if they are not stored under controlled conditions. Because seeds are hygroscopic (they absorb and hold moisture from the air), their moisture content can increase to a point where they are vulnerable to fungi or mold. Seed moisture content of 10 percent or less is preferred (Elias et al. 2002), and that can be achieved by drying seed and maintaining low storage temperatures and relative humidity.

To ensure proper storage, all seeds collected will be stored at a qualified vendor facility with experience in seed storage requirements. Seeds will be stored until the appropriate time in the project schedule and/or appropriate seasonal conditions are present to allow for reseeding within the project area.

3. Seed Bulking

If sufficient quantities of seed for direct seeding and container plant production are not obtained in 2024, seed may be bulked (grown out in nurseries or fields to increase total amount of seed) at a qualified vendor facility. A variety of species will be used for seed bulking based on what is available onsite. A list of species known to occur onsite has been included as Appendix B.

4. Seed Mix Development

Once seed has been acquired, the RE will coordinate with the qualified seed contractor to determine a suitable seed mix and seeding rate. Seeding rate will be specified as pounds per acre of bulk seed. Total seed application rates should include a minimum of 30 pounds per acre, but specific rates will be determined after seed collection and any bulking. To promote diversity and site stabilization, mixes should have as much species diversity as possible, however ultimately diversity will be determined by seed availability.

5. Seeding Methods

Seeding will be completed in the fall (October-November) to take advantage of the seasonal rainfall. Pre-treatment of seeds by the seed vendor to break dormancy will be completed prior to application, as necessary, and as determined by the RE and qualified vendor.

One or a combination of three available methods of seed application may be used depending on the specific restoration area conditions and natural regrowth. The methods include drill seeding, broadcast (or hand-broadcast) seeding, and hydroseeding.

a. Drill Seeding

Drill seeding places seeds at a depth specified by a machine, which may be a hand-operated drill. Drill seeding provides greater opportunity for seeds to be in contact with soil moisture, protects seeds from predation by birds or insects, and prevents small seeds from being carried away by wind or precipitation. This method of seeding is optimal for large seeds but can be used for seeds of all sizes. Because different sized seeds germinate at variable optimal depths, only seeds of similar size should be used in the drill simultaneously.

If implemented on the project, generally drill seeding will be used on sites devoid of natural regeneration and those that are greater than one acre in size with few impediments to maneuvering (Newton and Claassen 2003). Any corners or narrow areas that cannot be reached with the drill would be hand seeded. Hand seeding may be used to supplement a more natural regrowth pattern by scattering seeds in between rows of the drill seeder.

b. Hand Seeding

Hand seeding will generally be used where mechanical seeding is deemed infeasible because of natural regrowth, substrate, location, or area size. In general, application of hand-broadcast seed will be reserved for areas approximately 0.5 acre or less, in between patches of natural regeneration, or where small quantities of seed are needed. Hand-seeded sites will be raked or harrowed before seeding to break up the surface and after to allow seeds to fall into crevices. Raking or other post-seeding treatment to lightly cover seed will also be completed to enhance germination likelihood, provide even distribution of seed, and reduce losses to granivores. This will also help retain moisture for germination. The seed material may be broadcast by hand or using a seed spreader.

c. Hydroseeding

Hydroseeding is an effective method of reseeding that can be used in a variety of settings and with diverse seed mixes. Each hydroseed mix contains water, seeds, plant-based tackifier, and a small amount of sterile fiber mulch (if required to meet the project stormwater pollution prevention plan [SWPPP] requirements). If used, hydroseed mix will not include any fertilizer or seeds not collected specifically for the project in approved collection areas (onsite or adjacent similar habitat).

Just before the hydroseed is applied, the soil will be moistened to allow the seed to stick to the soil surface (Newton and Claassen 2003). However, if significant rainfall has occurred within 48 hours, pre-wetting may not be necessary as may be determined by the RE and PG&E. The hydroseed mixture will then be applied across the site. If deemed necessary by the RE and based on weather and soil moisture conditions, supplemental irrigation may be applied to a site after the hydroseed has been applied until germination.

D. Container Plant Production and Installation

If suitable seed and/or cuttings can be obtained from the site, a qualified vendor will produce container plants for installation in the active restoration zones (and any reclassified passive restoration zones, as material availability allows). The numbers, species, sizes, and spacing of container plants will be determined in conjunction with evaluation of overall planting site condition and quantity of container plants available. Contract grown container plants (utilizing seed or cutting from the project site) will only be grown at a reputable native plant nursery (qualified contractor) utilizing the most current industry standard best management practices for producing container stock free of *Phytophthora* and other soilborne diseases.

Container plants will be installed between October and November, ideally after a significant rain event (0.5 inches measured in a 24-hour period), and will be provided supplemental irrigation, as needed (as determined by the RE), through at least the first year to support establishment. Due to the time constraint of seed collection and the timeline to produce container plants of suitable size/condition for out planting, planting in the spring may be considered and evaluated by the RE and qualified vendor on a case-by-case basis. Certain species may not hold well in a nursery setting, in which case the

benefit of planting outside the ideal planting season (October-November) will be weighed against the challenges of keeping plants in the nursery until the 2025 planting season. Those container plants for which growth was initiated in 2024 that are not suitable size/condition for out planting in 2025, and if these plants will not benefit from planting outside the ideal planting season, they will be held in the nursery until the 2026 planting season.

An overall average spacing of 15 feet (ft) between plants (including naturally recruiting individual perennial native plants) will be used; however, planting locations will be field-fit to account for rocks and shallow soil substrate. If seed is available and vendors are able to produce container plants from available seed and cuttings, containers of perennial plants (targeting a density of approximately 200 plants per acre, including natural recruits) may be produced and installed within the active restoration zones. Additional plants may be produced for use in passive zones that may require reclassification after spring monitoring). Annual plants (plugs of grasses or forbs) may be produced and installed based on seed availability. If seed is available, additional quantities of container plants may be produced for replacement planting (20% additional container plants, as available).

Foliage protection (tree tubes or wire cages) will be provided to prevent herbivore damage if deer or other species browsing becomes a concern. Materials may consist of brightly painted stakes and wire cages or corrugated tree tubes, as appropriate. Wire pin flags may also be used to mark locations of container plants to facilitate maintenance and irrigation (described below).

E. Maintenance

Maintenance will include activities such as irrigation, installation/repair of herbivore protection, weed abatement, and replanting as needed to ensure restoration success.

1. Irrigation

Irrigation of container plants installed and native recruits within the restoration area may occur if the RE determines that supplemental irrigation is required during periods of lower-than-average precipitation. If conducted, irrigation will consist of a watering system, such as a removeable above-ground drip system or hose system that is fed by gravity connection to an onsite stationery tank or truck-mounted tank. Hand watering using garden hoses and buckets may also be used. In the first year, following planting, container plants and natural recruits will be irrigated based on current conditions from March through October. Subsequently, plants will be irrigated based on current conditions from March through October. In times of lower-than-average precipitation, the RE may recommend additional irrigation or irrigation from November through February as needed.

2. Weed Management

A weed management plan identifying target species and treatment approaches has been prepared in association with the Plan, see Appendix C. The weed management plan was developed in consultation with a Pesticide Control Advisor (PCA) with experience working in sensitive habitats with the target species.

Target species will include all non-native plant species with a Cal-IPC rating of “High” or non-native plant species otherwise found by PG&E and/or the RE to be impacting restoration site success or posing a risk to maintaining defensible space.

Manual control of target species is preferred (removal by hand pulling or tools). However, manual removal of target species such as pokeweed, Scotch broom, and tree-of-heaven can be ineffective once plants reach a certain size and established underground roots or rhizomes (DiTomaso et al. 2013). In these cases, selecting targeted usage of basal bark or cut stump herbicide application will be necessary. The usage of targeted herbicide or hand pulling may also be utilized on small infestations of some annual weeds such as yellow star thistle (*Centaurea solstitialis*) or mechanical methods (string trimming, selective mowing) may be necessary if infestations become large and present a threat to the reestablishment success of native species as determined by the RE.

Annual floristic surveys will map and monitor weed populations and treatment success. A qualified botanist will flag target species and/or provide monitoring during weed treatments to avoid impacts to non-target native species.

3. Restoration Site Signage

Informational signage will be installed at four locations along the restoration site to inform site visitors that access is restricted.

F. Annual Restoration Report

At the end of the first year of restoration activities (by January 31, 2025), PG&E will produce a report summarizing the restoration activities completed in 2024. A template of this report is included in Appendix D. At a minimum, the report will contain:

1. Baseline vegetation data
 - a. Native woody species stem counts,
 - b. Native percent cover, and
 - c. Non-native percent cover (including cover of species rated as “High” by Cal-IPC).
2. Dates and descriptions (including seed contractor, location(s) of seed collection, species of seed obtained) of seed collection and plant propagation activities conducted.
3. Description of the general restoration zone conditions and any zone reclassifications.
4. Photo documentation from a minimum of six representative vantage points, recorded with GPS and presented on an aerial figure (to be repeated annually). Location of reference plots and dates of photos taken will be included.
5. Plan for 2025 restoration activities and timeline.

IV. 2025 Project Activities

A. Annual Vegetation Monitoring

Vegetation monitoring will be conducted by the RE and/or qualified botanist in late spring 2025 to assess the condition of the restoration site. The monitoring is anticipated to occur in May or June 2025, depending on rainfall and average daily temperature and the anticipated phenology of the plants at the project area, as determined by the professional judgement of the RE. Sampling will occur along the permanent transects established in 2024 using the same methods (described above in Section III.A). In addition:

1. Photo documentation will be repeated at the permanent photo points established in 2024.
2. Survival data will be recorded for container plants installed.
3. Each restoration zone will receive a qualitative assessment to determine if there are any areas of concern or need for remedial actions.

B. Seed

Seed/propagule collection, storage, bulking and seeding will be repeated in 2025 following the methods outlined in Section III.C unless sufficient container plants were produced and enough seed was collected in 2024 to seed the active restoration areas and reseed any areas of 500 square feet or more with low cover (10% or less native cover) based on spring 2025 monitoring.

C. Container Plant Production and Installation

Container plants for which production was initiated in 2024 will be grown until they are an appropriate size to plant. Production of additional plants may occur in 2025 based on 2024 site performance. Methods for container plant production and planting will follow the methods described above in section III.D.

D. Maintenance

Maintenance will include activities such as irrigation, installation/repair of herbivore protection, weed abatement, and replanting as needed, as described in Section III.E.

E. Annual Restoration Report

PG&E will provide an annual report summarizing the restoration activities completed in 2025 by January 31, 2026. A template of this report is included in Appendix D. At a minimum, the report will contain:

1. Vegetation monitoring data (native woody species stem counts and native and non-native percent cover). Vegetation data will be summarized by total vegetative cover, native species cover, and non-native species cover (including cover of species rated as “High” by Cal-IPC).
2. Percent survival of container plants installed in the restoration area.
3. Qualitative assessment of tree/shrub growth and health.
4. Dates and descriptions of seed collection, plant propagation, additional planting, and maintenance activities conducted.
5. Description of the general restoration zone conditions and any zone reclassifications.
6. Photo documentation from the six, or more, representative vantage points established in 2024 Annual Report.
7. Recommendation for any remedial restoration activities.
8. Plan for 2026 restoration activities and timeline.

V. 2026 Project Activities

A. Annual Vegetation Monitoring

Vegetation monitoring will be conducted by the RE and/or qualified botanist in late spring 2026 to assess the condition of the restoration site. The monitoring is anticipated to occur in May or June 2026 based on rainfall and average daily temperature and the anticipated phenology of the plants at the project area, as determined by the professional judgement of the RE. Sampling will occur along the permanent transects established in 2024 and any additional transects, if added in 2025 to provide better representation of overall site conditions as recovery progresses, using the same survey methods employed in Section III.A.

B. Seed

Seed/propagule collection, storage, bulking and seeding will be repeated in 2026 following the methods outlined in Section III.C unless sufficient container plants were produced and enough seed was collected in 2024 and/or 2025 to seed the active restoration areas and reseed any areas of 500 square feet or more with low cover (10% or less native cover) based on spring 2026 monitoring.

C. Container Plant Production and Installation

Plants produced but not installed in 2025 will be installed in 2026. Production of additional plants may occur in 2026 based on previous site performance if they can be grown to suitable size for out planting in fall 2026 (the final planting effort). Methods for container plant production and planting will follow the surveying methods above in Section III.D.

D. Maintenance

Maintenance will include activities such as irrigation, installation/repair of herbivore protection, weed abatement, and replanting as needed, as described in Section III.E.

E. Annual Restoration Report

PG&E will produce an annual report summarizing the restoration activities completed in 2026 by January 31, 2027. A template of this report is included in Appendix D. At a minimum, the report will contain:

1. Vegetation monitoring data (native woody species stem counts and native and non-native percent cover). Vegetation data will be summarized by total vegetative cover, native species cover, and non-native species cover (including cover of species rated as “High” by Cal-IPC).
2. Percent survival of container plants.
3. Qualitative assessment of tree/shrub growth and health.
4. Dates and descriptions of seed collection, plant propagation, additional planting, and maintenance activities conducted.
5. Description of the general restoration zone conditions and any zone reclassifications.
6. Photo documentation from permanent photo point locations.
7. Recommendation for any remedial restoration activities.

VI. References Cited

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Appendix A

Site Photographs



Photo 1: View from south-central portion of site (south of LNG facility) facing east. This photo depicts the condition of the southern portion of the site where vegetation was cleared, but soil disturbance was minimized to tire tracking/rutting in limited areas (beyond staking and rock piles). Surficial rocks and stumps indicate approximate limit of undisturbed soils. October 3, 2023.



Photo 2: View from west-central portion of site (west of the LNG facility) facing north. Disturbance in this area was limited to vegetation removal and surficial soil disturbance from rubber-tired vehicles (note tracking and limited soil churning evident under the layer of BFM). October 3, 2023.



Photo 3: View from northwest corner of parcel facing south. Stump locations indicate areas where site disturbance was limited to vegetation removal and vehicular access, and the extent to which the BFM was applied. October 3, 2023.



Photo 4: View from north-central portion of site facing east along northern boundary. Disturbance along this section ranges from vegetation removal with minor soil disturbance to substantial soil disturbance/grading. October 3, 2023.



Photo 5: View from southeast corner of site facing northwest, across section of site cleared of vegetation with topsoil replacement. October 3, 2023.



Photo 6: Northeast portion of site facing east. Vegetation was cleared in this area and topsoil has been mixed with subsoil material. October 3, 2023.



Photo 7: Oak sprouts along northern site border. October 3, 2023.



Photo 8: Significant growth of small native shrubs is present within the southern portion of the site, including but not limited to manzanita, yerba santa, poison oak, deerbrush, coffee berry, Pratten's buckwheat, honeysuckle, and evergreen buckthorn. Dried stalks of some herbaceous perennials such as soap plant (*Chlorogalum pomeridianum*) were noted in this area as well as resprouting oak stumps. October 3, 2023.



Photo 9: Southern portion of site at limit of soil disturbance. Woody species present in this representative photo include incense cedar (*Calocedrus decurrens*), poison oak, coffee berry, evergreen buckthorn, foothill pine (*Pinus sabiniana*), and oak. October 3, 2023.

Appendix B

Plant Species Known to Occur in Project Vicinity

Botanical Name	Common Name	Growth form
Native Annuals and Herbaceous Perennials		
<i>Achyrachaena mollis</i>	blow wives	Annual
<i>Acmispon americanus</i> var. <i>americanus</i>	Spanish clover	Annual
<i>Acmispon parviflorus</i>	small flower lotus	Annual
<i>Agoseris grandiflora</i>	large flower agoseris	Perennial Herb
<i>Agoseris heterophylla</i>	annual agoseris	Annual
<i>Allium amplexans</i>	narrowleaf onion	Perennial Herb
<i>Allium sanbornii</i>	Sanborn's onion	Perennial Herb
<i>Allium sanbornii</i> var. <i>congdonii</i>	Congdon's onion	Perennial Herb
<i>Antirrhinum cornutum</i>	spurred snapdragon	Annual
<i>Arceuthobium campylopodum</i>	western dwarf mistletoe	Perennial Herb
<i>Artemisia douglasiana</i>	California mugwort	Perennial Herb
<i>Asclepias cordifolia</i>	heart-leaf milkweed	Perennial Herb
<i>Athysanus pusillus</i>	common sandweed	Annual
<i>Brodiaea elegans</i>	harvest brodiaea	Perennial Herb
<i>Brodiaea minor</i>	small brodiaea	Perennial Herb
<i>Calandrinia menziesii</i>	red maids	Annual
<i>Callitriche palustris</i>	vernal pool callitriche	Annual
<i>Calochortus albus</i>	white globe lily	Perennial Herb
<i>Calochortus monophyllus</i>	yellow star tulip	Perennial Herb
<i>Calycadenia truncata</i>	Oregon western rosinweed	Annual
<i>Calystegia occidentalis</i>	western morning glory	Perennial Herb
<i>Castilleja attenuata</i>	narrow leaved owl's clover	Annual
<i>Castilleja lineariloba</i>	valley tassels	Annual
<i>Chlorogalum pomeridianum</i> var. <i>pomeridianum</i>	wavy-leaf soap plant	Perennial Herb
<i>Chorizanthe polygonoides polygonoides</i>	knotweed spineflower	Annual
<i>Cirsium occidentale</i>	western thistle	Perennial Herb
<i>Cirsium occidentale</i> var. <i>venustum</i>	venus thistle	Perennial Herb
<i>Clarkia amoena</i> ssp. <i>amoena</i>	farewell to spring	Annual
<i>Clarkia arcuata</i>	glandular clarkia	Annual
<i>Clarkia gracilis</i>	graceful clarkia	Annual
<i>Clarkia purpurea</i> ssp. <i>quadrivulnera</i>	four-spot	Annual
<i>Clarkia purpurea</i> ssp. <i>viminea</i>	winecup clarkia	Annual
<i>Clarkia rhomboidea</i>	diamond clarkia	Annual

Botanical Name	Common Name	Growth form
<i>Clarkia williamsonii</i>	Williamson's clarkia	Annual
<i>Claytonia perfoliata</i>	miner's lettuce	Annual
<i>Collinsia parviflora</i>	maiden blue-eyed Mary	Annual
<i>Collinsia sparsiflora</i>	few flowered collinsia	Annual
<i>Collinsia sparsiflora</i> var. <i>collina</i>	hillside collinsia	Annual
<i>Collinsia tinctoria</i>	sticky Chinese houses	Annual
<i>Crassula connata</i>	pigmy weed	Annual
<i>Croton setiger</i>	turkey mullein	Annual
<i>Cryptantha affinis</i>	side-grooved cryptantha	Annual
<i>Delphinium gracilentum</i>	pine forest larkspur	Perennial Herb
<i>Delphinium patens</i>	spreading larkspur	Perennial Herb
<i>Dicentra formosa</i>	Pacific bleeding heart	Perennial Herb
<i>Diplacus angustatus</i>	purplip pansy monkeyflower	Annual
<i>Diplacus layneae</i>	Layne's monkeyflower	Annual
<i>Diplacus torreyi</i>	Torrey's monkeyflower	Annual
<i>Dipterostemon capitatus</i>	blue dicks	Perennial Herb
<i>Downingia ornatissima</i>	horned downingia	Annual
<i>Elymus multisetus</i>	big squirreltail grass	Perennial Herb
<i>Epilobium brachycarpum</i>	panicled willowherb	Annual
<i>Epilobium ciliatum</i>	ciliate willowherb	Perennial Herb
<i>Epilobium torreyi</i>	Torrey's willowherb	Annual
<i>Erigeron canadensis</i>	Canadian horse weed	Annual
<i>Eriophyllum lanatum</i>	common woolly sunflower	Perennial Herb
<i>Erythranthe bicolor</i>	yellow & white monkeyflower	Annual
<i>Erythranthe guttata</i>	seep monkeyflower	Annual
<i>Erythranthe pulsiferae</i>	Pulsifer's monkeyflower	Annual
<i>Euphorbia crenulata</i>	Chinese caps	Annual
<i>Festuca microstachys</i>	six week fescue	Annual
<i>Fritillaria micrantha</i>	brown fritillary	Perennial Herb
<i>Fritillaria recurva</i>	scarlet fritillary	Perennial Herb
<i>Galium aparine</i>	catchweed bedstraw	Annual
<i>Githopsis specularioides</i>	common bluecup	Annual
<i>Gratiola ebracteata</i>	hedge hyssop	Annual
<i>Grindelia camporum</i>	gumplant	Perennial Herb
<i>Gruvelia pusilla</i>	little gruvelia	Annual
<i>Heterocodon rariflorum</i>	Western pearlflower	Annual
<i>Horkelia tridentata</i>	three tooth horkelia	Perennial Herb
<i>Iris hartwegii</i>	Hartweg's iris	Perennial Herb
<i>Iris macrosiphon</i>	bowltube iris	Perennial Herb
<i>Isoetes orcuttii</i>	Orcutt's quillwort	Perennial Herb
<i>Jensia rammii</i>	Ramm's madia	Annual

Botanical Name	Common Name	Growth form
<i>Juncus balticus</i>	Baltic rush	Perennial Herb
<i>Juncus bufonius</i>	toad rush	Annual
<i>Juncus effusus</i>	smooth rush	Perennial Herb
<i>Juncus tenuis</i>	slender rush	Perennial Herb
<i>Juncus uncialis</i>	moss rush	Annual
<i>Lepidium nitidum</i>	shining pepperweed	Annual
<i>Leptosiphon liniflorus</i>	flax-flowered phlox	Annual
<i>Leptosiphon liniflorus</i>	flax-flowered phlox	Annual
<i>Lilium humboldtii</i> ssp. <i>humboldtii</i>	Humboldt lily	Perennial Herb
<i>Limnanthes alba</i> ssp. <i>alba</i>	meadowfoam	Annual
<i>Limnanthes alba</i> ssp. <i>versicolor</i>	white meadowfoam	Annual
<i>Lithophragma heterophyllum</i>	woodland star	Perennial Herb
<i>Lithophragma parviflorum</i> var. <i>parviflorum</i>	pink woodland star	Perennial Herb
<i>Lupinus bicolor</i>	miniature lupine	Annual
<i>Lupinus congdonii</i>	lava cap lupine	Annual
<i>Lupinus nanus</i>	sky lupine	Annual
<i>Madia elegans</i>	common madia	Annual
<i>Madia exigua</i>	threadstem tarweed	Annual
<i>Madia gracilis</i>	grassy tarweed	Annual
<i>Marah watsonii</i>	taw man-root	Perennial Herb
<i>Matricaria discoidea</i>	pineapple weed	Annual
<i>Micranthes californica</i>	California saxifrage	Perennial Herb
<i>Micranthes integrifolia</i>	wholeleaf saxifrage	Perennial Herb
<i>Micropus californicus</i> var. <i>californicus</i>	cottontop	Annual
<i>Microseris acuminata</i>	Sierra foothills microseris	Annual
<i>Microseris douglasii</i>	Douglas' microseris	Annual
<i>Microsteris gracilis</i>	slender phlox	Annual
<i>Minuartia douglasii</i>	Douglas' sandwort	Annual
<i>Monardella breweri</i> ssp. <i>lanceolata</i>	Mustang mint	Annual
<i>Montia fontana</i>	blinks	Annual
<i>Navarretia divaricata</i>	mountain navarretia	Annual
<i>Navarretia intertexta</i>	needleleaf navarretia	Annual
<i>Navarretia leucocephala</i>	white headed navarretia	Annual
<i>Navarretia tagetina</i>	marigold pincushionplant	Annual
<i>Navarretia torreyella</i>	none	Annual
<i>Penstemon heterophyllus</i>	foothill penstemon	Perennial Herb
<i>Pentagramma triangularis</i>	goldback fern	Perennial Herb
<i>Perideridia bolanderi</i> ssp. <i>involucrata</i>	Bolander's yampah	Perennial Herb
<i>Plagiobothrys greenei</i>	Greene's popcornflower	Annual
<i>Plagiobothrys scriptus</i>	scribed popcornflower	Annual
<i>Plagiobothrys stipitatus</i> var. <i>micranthus</i>	vernal pool popcornflower	Annual

Botanical Name	Common Name	Growth form
<i>Plagiobothrys tenellus</i>	stalked/pacific popcornflower	Annual
<i>Plantago erecta</i>	dot-seed plantain	Annual
<i>Polygonum californicum</i>	California knotweed	Annual
<i>Polygonum parryi</i>	Parry's knotweed	Annual
<i>Primula hendersonii</i>	Henderson's shooting star	Perennial Herb
<i>Pseudognaphalium beneolens</i>	fragrant cudweed	Perennial Herb
<i>Pseudognaphalium californicum</i>	California cudweed	Annual
<i>Psilocarphus brevissimus</i> var. <i>brevissimus</i>	dwarf woolly marbles	Annual
<i>Psilocarphus tenellus</i>	slender woolly marbles	Annual
<i>Rigiopappus leptocladus</i>	wireweed	Annual
<i>Sabulina douglasii</i>	Douglas' stitchwort	Annual
<i>Sagittaria latifolia</i>	broadleaf arrowhead	Perennial Herb
<i>Sanicula tuberosa</i>	tuberous sanicle	Perennial Herb
<i>Scribneria bolanderi</i>	scribneria	Annual
<i>Scutellaria tuberosa</i>	blue skullcap	Perennial Herb
<i>Sedella pumila</i>	Sierra mock stonecrop	Annual
<i>Sidalcea asprella</i>	checker mallow	Perennial Herb
<i>Sidalcea hartwegii</i>	Hartweg's checkerbloom	Annual
<i>Solidago velutina</i>	velvety goldenrod	Perennial Herb
<i>Stipa lemmonii</i>	Lemmon's needle grass	Perennial Herb
<i>Streptanthus tortuosus</i>	mountain jewelflower	Perennial Herb
<i>Tauschia hartwegii</i>	Hartweg's tauschia	Perennial Herb
<i>Thalictrum fendleri</i>	Fendler's meadow-rue	Perennial Herb
<i>Thalictrum fendleri</i> var. <i>polycarpum</i>	many fruited meadow rue	Perennial Herb
<i>Thysanocarpus curvipes</i>	Sand fringe pod	Annual
<i>Toxicoscordion venenosum</i> var. <i>venenosum</i>	meadow death camas	Perennial Herb
<i>Trichostema oblongum</i>	oblong/mountain bluecurls	Annual
<i>Trichostema simulatum</i>	Siskyou bluecurls	Annual
<i>Trifolium ciliolatum</i>	tree clover	Annual
<i>Trifolium depauperatum</i> var. <i>depauperatum</i>	dwarf sack clover	Annual
<i>Trifolium microcephalum</i>	small head clover	Annual
<i>Trifolium variegatum</i> var. <i>variegatum</i>	variegated clover	Annual
<i>Trifolium willdenovii</i>	tomcat clover	Annual
<i>Triphysaria eriantha</i> ssp. <i>eriantha</i>	butter-and-eggs/johnny tuck	Annual
<i>Triteleia hyacinthina</i>	white brodiaea	Perennial Herb
<i>Triteleia ixioides</i>	pretty face	Perennial Herb
<i>Uropappus lindleyi</i>	silverpuffs	Annual
<i>Vicia americana</i> ssp. <i>americana</i>	American vetch	Perennial Herb
<i>Viola purpurea</i>	goosefoot/mountain violet	Perennial Herb
<i>Viola purpurea</i> ssp. <i>quercetorum</i>	mountain violet	Perennial Herb
<i>Viola sheltonii</i>	Shelton's violet	Perennial Herb

Botanical Name	Common Name	Growth form
<i>Zeltnera venusta</i>	California century	Annual
Native Trees and Shrubs		
<i>Alnus rhombifolia</i>	white alder	Tree
<i>Arctostaphylos mewukka</i> ssp. <i>mewukka</i>	Indian manzanita	Shrub
<i>Arctostaphylos viscida</i>	whiteleaf manzanita	Shrub
<i>Arctostaphylos viscida</i> ssp. <i>viscida</i>	smooth whiteleaf manzanita	Shrub
<i>Baccharis pilularis</i>	coyote brush	Shrub
<i>Berberis aquifolium</i> var. <i>dictyota</i>	shining netvein barberry	Shrub
<i>Calocedrus decurrens</i>	California incense cedar	Tree
<i>Ceanothus cuneatus</i>	buckbrush	Shrub
<i>Ceanothus integerrimus</i>	deerbrush	Shrub
<i>Ceanothus lemmonii</i>	Lemmon's ceanothus	Shrub
<i>Chamaebatia foliolosa</i>	mountain misery	Shrub
<i>Cornus nuttallii</i>	Pacific dogwood	Tree
<i>Corylus cornuta</i>	beaked hazelnut	Tree
<i>Ericameria arborescens</i>	golden fleece	Shrub
<i>Eriodictyon californicum</i>	California yerba santa	Shrub
<i>Eriogonum prattenianum</i> var. <i>prattenianum</i>	Pratten's buckwheat	Shrub
<i>Frangula californica</i> ssp. <i>tomentella</i>	hoary coffeeberry	Shrub
<i>Frangula rubra</i>	Sierra coffeeberry	Shrub
<i>Galium porrigens</i> var. <i>tenu</i>	climbing bedstraw	Shrub/vine
<i>Garrya fremontii</i>	Freemont's silktassel	Shrub
<i>Heteromeles arbutifolia</i>	toyon	Shrub
<i>Lonicera hispidula</i>	pink honeysuckle	Shrub
<i>Lonicera interrupta</i>	chaparral honeysuckle	Shrub
<i>Pickeringia montana</i>	chaparral pea	Shrub
<i>Pinus lambertiana</i>	sugar pine	Tree
<i>Pinus ponderosa</i>	ponderosa pine	Tree
<i>Pinus sabiniana</i>	gray/foothill pine	Tree
<i>Prunus subcordata</i>	Pacific plum	Shrub
<i>Pseudotsuga menziesii</i>	Douglas fir	Tree
<i>Quercus chrysolepis</i>	canyon live oak	Tree
<i>Quercus douglasii</i>	blue oak	Tree
<i>Quercus garryana</i> var. <i>breweri</i>	Brewer's white oak	Tree
<i>Quercus kelloggii</i>	black oak	Tree
<i>Quercus lobata</i>	valley oak	Tree
<i>Quercus wislizeni</i>	interior live oak	Tree
<i>Rhamnus ilicifolia</i>	hollyleaf redberry	Shrub
<i>Rhinotropis cornuta</i>	Sierra milkwort	Shrub
<i>Ribes roezlii</i>	Sierra gooseberry	Shrub

Botanical Name	Common Name	Growth form
<i>Salix exigua</i>	narrowleaf willow	Shrub
<i>Salix lasiandra</i> var. <i>lasiandra</i>	pacific willow	Shrub
<i>Salix lasiolepis</i>	arroyo willow	Shrub
<i>Salix melanopsis</i>	dusky willow	Shrub
<i>Salvia sonomensis</i>	Sonoma sage	Shrub
<i>Solanum xanti</i> (<i>umbelliferum</i>)	nightshade	Shrub
<i>Symphoricarpos albus</i> var. <i>laevigatus</i>	common snowberry	Shrub
<i>Toxicodendron diversilobum</i>	Pacific poison oak	Shrub
<i>Vitis californica</i>	California wild grape	Shrub

Botanical Name	Common Name	Growth form	Cal-IPC Rating
Non-native Annuals and Herbaceous Perennials			
<i>Aegilops triuncialis</i>	goatgrass	Annual	High
<i>Aira caryophyllaea</i>	silvery hairgrass	Annual	Not rated
<i>Amaranthus albus</i>	Pigweed, tumbleweed	Annual	Not rated
<i>Ammi visnaga</i>	bisnaga	Annual	Not rated
<i>Avena barbata</i>	slim oat	Annual	Moderate
<i>Briza maxima</i>	greater quaking grass	Annual	Limited
<i>Bromus diandrus</i>	rip gut brome	Annual	Moderate
<i>Bromus hordeaceus</i>	downy chess	Annual	Limited
<i>Bromus rubens</i>	red brome	Annual	High
<i>Cardamine hirsuta</i>	hairy bittercress	Annual	Not rated
<i>Centaurea solstitialis</i>	yellow star thistle	Annual	High
<i>Cerastium glomeratum</i>	large mouse ears	Annual	Not rated
<i>Chenopodium album</i>	lambsquarters	Annual	Not rated
<i>Cichorium intybus</i>	chicory	Perennial Herb	Not rated
<i>Crucianella angustifolia</i>	Narrow leafed crucianella	Annual	Not rated
<i>Cynosurus echinatus</i>	hedgehog dogtail	Annual	Moderate
<i>Daucus carota</i>	Queen Anne's lace	Perennial Herb	Not rated
<i>Draba verna</i>	common whitlowgrass	Annual	Not rated
<i>Erigeron strigosus</i>	prarie fleabane	Annual	Not rated
<i>Erodium botrys</i>	Mediterranean stork's bill	Annual	Not rated
<i>Erodium brachycarpum</i>	hairy-pitted stork's bill	Annual	Not rated
<i>Erodium cicutarium</i>	redstem stork's bill/filaree	Annual	Limited
<i>Festuca myuros</i>	rattail sixweeks grass	Annual	Moderate
<i>Galium murale</i>	tiny bedstraw	Annual	Not rated
<i>Galium parisiense</i>	wall bedstraw	Annual	Not rated

Botanical Name	Common Name	Growth form	Cal-IPC Rating
<i>Hordeum murinum</i>	wall barley	Annual	Moderate
<i>Hypericum perforatum</i> ssp. <i>perforatum</i>	klamathweed	Perennial Herb	Limited
<i>Hypochaeris glabra</i>	smooth cat's ears	Annual	Limited
<i>Hypochaeris radicata</i>	hairy cat's ear	Perennial Herb	Moderate
<i>Isolepis setacea</i>	bristle-leaf bulrush	Perennial Herb	Not rated
<i>Juncus capitatus</i>	leafybract dwarf rush	Annual	Not rated
<i>Lactuca saligna</i>	willowleaf lettuce	Annual	Not rated
<i>Lactuca serriola</i>	prickly lettuce	Annual	Not rated
<i>Lathyrus latifolius</i>	broad leaved sweet pea	Perennial Herb	Watch
<i>Lathyrus sphaericus</i>	grass pea	Annual	Not rated
<i>Logfia gallica</i>	Narrowleaf cottonrose	Annual	Not rated
<i>Lythrum hyssopifolia</i>	hyssop loosestrife	Annual	Moderate
<i>Persicaria maculosa</i>	Spotted ladythumb	Annual	Not rated
<i>Petrorhagia dubia</i>	hairy pink	Annual	Not rated
<i>Physalis pubescens</i> var. <i>grisea</i>	strawberry groundcherry	Annual	Not rated
<i>Phytolacca americana</i>	American pokeweed	Perennial Herb	Limited
<i>Poa annua</i>	annual meadow grass	Annual	Not rated
<i>Poa bulbosa</i> var. <i>vivipara</i>	viviparous bulbous bluegrass	Perennial Herb	Not rated
<i>Rumex acetosella</i>	sheep's sorrel	Perennial Herb	Moderate
<i>Sanguisorba minor</i>	salad burnet	Perennial Herb	Not rated
<i>Scleranthus annuus</i> ssp. <i>annuus</i>	annual knawel	Annual	Not rated
<i>Sherardia arvensis</i>	field madder	Annual	Not rated
<i>Silene gallica</i>	common catchfly	Annual	Not rated
<i>Solanum nigrum</i>	black nightshade	Annual	Not rated
<i>Spergularia rubra</i>	Sandspurry	Annual	Not rated
<i>Stellaria media</i>	common chickweed	Annual	Not rated
<i>Tragopogon dubius</i>	yellow salsify	Perennial Herb	Not rated
<i>Tragopogon porrifolius</i>	purple salsify	Perennial Herb	Not rated
<i>Trifolium dubium</i>	lesser hop trefoil	Annual	Not rated
<i>Trifolium glomeratum</i>	maiden clover	Annual	Not rated
<i>Trifolium hirtum</i>	rose clover	Annual	Limited
<i>Trifolium pratense</i>	red clover	Perennial Herb	Not rated
<i>Trifolium repens</i>	white clover	Perennial Herb	Not rated
<i>Trifolium striatum</i>	knotted clover	Annual	Not rated
<i>Trifolium subterraneum</i>	subterranean clover	Annual	Not rated
<i>Verbascum blattaria</i>	moth mullein	Perennial Herb	Not rated
<i>Verbascum thapsus</i>	great mullein	Perennial Herb	Limited
<i>Vicia sativa</i>	spring vetch	Annual	Not rated

Botanical Name	Common Name	Growth form	Cal-IPC Rating
Non-native Trees and Shrubs			
<i>Ailanthus altissima</i>	tree of heaven	Tree	Moderate
<i>Cytisus scoparius</i>	Scotch broom	Shrub	High
<i>Rosa canina</i>	dog rose	Shrub	Not rated
<i>Rubus armeniacus</i>	Himalayan blackberry	Shrub	High

Cal-IPC Inventory Ratings (<https://www.cal-ipc.org/plants/inventory/>):

High – These species have severe ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate to high rates of dispersal and establishment. Most are widely distributed ecologically.

Moderate – These species have substantial and apparent-but generally not severe-ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate to high rates of dispersal, though establishment is generally dependent upon ecological disturbance. Ecological amplitude and distribution may range from limited to widespread.

Limited – These species are invasive but their ecological impacts are minor on a statewide level or there was not enough information to justify a higher score. Their reproductive biology and other attributes result in low to moderate rates of invasiveness. Ecological amplitude and distribution are generally limited, but these species may be locally persistent and problematic.

Alert – An Alert is listed on species with High or Moderate impacts that have limited distribution in California, but may have the potential to spread much further.

Watch – These species have been assessed as posing a high risk of becoming invasive in the future in California.

Appendix C

Weed Management Plan

Weed Management Plan

Applying Integrated Vegetation Management Principles at I-194D

PG&E is proposing an Integrated Vegetation Management Program (IVMP) which would include the use of both mechanical control and herbicide applications to maintain the site and enhance the populations of native vegetation at the project site at the recently constructed liquified natural gas (LNG) facility in Nevada County, California associated with project I-194D. The IVMP strategy would be two-fold, one for the graveled areas along the access road and inside the fenced gas facility and the other for outside the facility in the restoration area.

A vegetation free/clean zone would be established on graveled areas within the parcel, including graveled access roads, inside of the fenced gas facility and a several feet outside the facility fence. To achieve this, both a pre-emergent blend herbicide application and manual mechanical methods (hand-pulling) will be used to maintain bare-ground. It is critical to keep the area around the equipment vegetation free to ensure the safety of the workers and safe operation of the equipment. This also provides defensible space from wildfire for the equipment inside the facility and ensures the safety of firefighters defending the facility in the event of a wildfire.

Within in the restoration area, the establishment and proliferation of native plants is key to the effort of establishing a natural landscape. This includes a reduction in populations of invasive plant species. The strategy within the restoration area to achieve this includes the use of power tools and hand-pulling in combination with the application of selective herbicide blends. Selective herbicides work to control targeted, invasive species while leaving non-target advantageous plants to thrive. Initial treatments will rely on spot applications of selective post-emergent herbicide blends. Selective pre-emergent blends may be prescribed in the restoration area as needed as a leading-edge treatment to prevent invasive species, a common practice utilized on natural and wild lands.

The intent of this IVMP is to maintain the project site to ensure the safe and reliable operation of the facility while enhancing the restoration area, including benefits to habitat for both wildlife and native plants.

IVMP Strategies for I-194D

Restoration Area

Current populations of invasive and non-native plants need to be managed. Herbicide treatment along with mechanical treatment methods are necessary for success. Currently, Goatgrass (*Aegilops spp*), Yellow starthistle (*Centaurea spp*), American pokeweed (*Phytolacca americana*), Tree of Heaven (*Ailanthus altissima*), Scotch broom (*Cytisus scoparius*) and Himalayan blackberry (*Rubus Armeniacus*) are present on site and will be the most challenging to control if left unchecked. These species will become more pervasive making control more difficult and costly. Management tools including herbicide application, mechanical removal, application method, and timing of application will all be considered to minimize adverse effects to the desirable species present. It is expected some adaptation of these management tools may be necessary as site conditions change. IVM is about an adaptive strategy. PG&E will maintain a diverse toolbox. Having the appropriate tools, specific to the site and species present will prove necessary for success.

Initial efforts will rely on both mechanical and manual removal of selected invasive plant species and post emergent herbicide blends. This initial approach will allow for control of larger populations of invasives and undesirable species without affecting future germination of desirable species. Manual removal and post emergent selective treatments tend to be more precise with less potential for long term residual effects. Project design features will include mitigation measures to protect wildlife and desirable plant species, along with water and other resources. Project Best Management Practices (BMPs) will be followed during treatments. This would include using hand-tools during manual removal such as lopping sheers, simple hand-pulling and bagging plants prior to removal to capture seed. Considering herbicide application, the use of drift agents and drift control nozzles will be implemented to reduce off-target movement. Another tool that can be used in the field is the shielding of plants when performing work near desirable native species to reduce potential damage from nearby treatment activities. With herbicide treatments, spray pattern indicators will be used to help the applicators see very clearly where the herbicide has been sprayed. Weather BMPs will be followed and include current or expected soil conditions, the review of current wind and rain along with the forecast for treatment timeframe. If BMP conditions are not met, herbicide applications will be postponed until more favorable weather conditions exist.

Facility and Asset Setback – Defensible Space Zones

Within 100 ft. of the gas utility facility, PG&E will maintain a defensible space zone. The first 30 ft. of this zone is referred to as the “Clean Zone” and is maintained as a fire break. In this zone all flammable vegetation will be removed prior to fire season. The zone from 30 ft. to 100 ft. is referred to as the “Reduced Fuel Zone”. In this zone the goal is to maintain the area with reduced fuel load to inhibit progression and reduce the risk of fire moving through the zone. Grasses will be reduced to 4” or less before fire season, ladder fuels removed or reduced, appropriate spacing between trees implemented, elevating canopies as needed and removing

any dead, dying or diseased vegetation. These fuel standards will be achieved using hand tools such as string trimmers and chainsaws.

The methodology used to manage invasive species in these areas will be the same standards is the same as described above in the Restoration Area section.

PG&E Graveled Facility Areas

The safe access and use of the facility is of utmost importance for the safety of our employees and customers. To achieve a safe working environment, the interior of the gas asset, as well as the surrounding fence line and road, will be kept vegetation free. For treatment within specified facility footprint, PG&E will rely primarily on pre and post emergent herbicides. The herbicide selection will consider surrounding environments. As with the post-emergent treatments, site and project specific best management practices will apply.

Appendix D

Annual Report Template

**ANNUAL RESTORATION AND MITIGATION MONITORING REPORT
(YEAR-1 2025) FOR**

**PACIFIC GAS & ELECTRIC COMPANY'S
I-194D PROJECT**

PREPARED FOR:

Pacific Gas & Electric Company
Contact: Lindsey Koos and
Jordan McKay
Phone: 925-983-9023

PREPARED BY:

Kleinfelder
3130 Kilgore Road, Suite 200
Rancho Cordova, California 95670
Contact: Susan Dewar



***Pacific Gas and
Electric Company®***

January 2025

SAMPLE

Pacific Gas and Electric Company (PG&E). 2025. *Annual Restoration and Mitigation Monitoring Report for Pacific Gas and Electric Company's I-194D Project*. January 2025. Grass Valley, California. Prepared by Kleinfelder, Rancho Cordova, California.

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I-194D Project Annual Restoration and Mitigation Monitoring Report (Year-1 2025)

I. Introduction

This Annual Restoration and Mitigation Monitoring Report (Annual Report) has been prepared to document native species revegetation activities conducted on a disturbed parcel associated with a recently constructed liquified natural gas (LNG) facility in Nevada County, California. The project site is accessed off Adam Avenue near the intersection of Ridge Road and Rough and Ready Highway west of Grass Valley (Figure 1).

A. Site Description

The project site, an approximately 14-acre parcel owned by Pacific Gas & Electric Company (PG&E), is part of a feature known locally as “Hell’s Half Acre”. Hell’s Half Acre is a botanically and geologically unique habitat (lava cap [Saucedo and Wagner 1992, Callahan and Buck-Diaz 2016]). Shallow soils are underlain by volcanic mudflow (NRCS 2023, Saucedo and Wagner 1992). The shallow soils and seasonally varied soil hydrology created a diverse floristic community of native plants within microhabitats across the site.

In 2023, PG&E purchased the 14-acre project site to construct a gas transmission station. This construction resulted in the clearing of woody vegetation with heavy equipment across the entire project site and grading of approximately 8.3 acres of the project site, approximately 3.5 acres of which is now the LNG facility and appurtenant features. As of October 2023, the 3.5 developed acres include a fenced gravel-surfaced pad, gravel access road, and an earthen retention basin. The remaining portion of the project site, approximately 10.5 acres, is either partially disturbed (trees removed with stumps remaining, some soil churned/rutting but predominantly vegetated) or disturbed (bare soil). Excluding facility and asset setback areas within this 10.5 acres of partially disturbed or disturbed bare soil is 5.7 acres hereinafter referred to as the “restoration area”. In 2024, the Restoration and Mitigation and Monitoring Plan (PG&E 2024; Plan) was prepared to define the approach to restore the restoration area.

B. Project Goals

The goals of the Plan are to:

1. Reestablish locally occurring native vegetation within the 5.7-acre restoration area within the project site, and
2. Suppress growth and spread of invasive species at the project site.

Execution of the Plan is expected to result in the creation of a stable, early-successional native plant community within the restoration area that will include a mix of locally sourced native trees, shrubs,

and herbaceous plants to replace the vegetation that was removed during construction of the LNG facility.

C. Restoration Area Classifications

The restoration area has been classified into three categories based on conditions as of December 2023 and anticipated capacity for natural recovery: 1) maintenance zones, 2) passive restoration zones, and 3) active restoration zones (Figure 2).

1. Maintenance Zones

Maintenance zones include areas that have an intact seedbank and which were showing signs of resprouting/recovery in the fall of 2023 or are reclassified during annual monitoring. These areas are not expected to require additional seeding or planting, but they will receive maintenance through the treatment of target invasive weeds and protection of native volunteer seedlings/resprouts.

2. Passive Restoration Zones

Passive restoration zones include areas that have the native topsoil or may contain potential native seedbank, as evidenced by native resprouting plants in fall of 2023, that may not require additional seeding or planting. These areas require monitoring to determine the potential for natural recovery. Passive restoration zones will require treatment of target weeds.

3. Active Restoration Zones

Active restoration zones include areas that are not expected to contain sufficient seedbank to recover without seeding and/or planting of container stock or have been identified in the 2024 spring assessment to not be recovering. These areas will be most susceptible to weed invasion due to the level of soil disturbance.

4. PG&E Facility and Asset Setback Areas

Facility and asset setback areas will not receive active restoration (seeding or planting) and will not be monitored due to work that must occur within these zones to reduce the risk of fire and maintain the safety of gas facilities in the event of a fire. PG&E implements defensible space standards in and around certain PG&E owned gas facilities, including the station on the project site. Because PG&E must manage vegetation growth within required defensible space setbacks, no container plants will be installed within 100 feet of the station fence line or within 30 feet of underground pipelines and no seed of woody perennial species will be applied in either of these areas. Seed of annual or herbaceous perennials may be applied between 30-100 feet of the LNG fence line or within the pipeline setback area if excess quantities are available and are not needed in other active restoration areas.

D. Responsible Parties

1. Pacific Gas & Electric Company

PG&E is the owner/operator and is responsible for the restoration and monitoring outlined in the Plan. PG&E contracted with a Restoration Contractor (RC) team to implement onsite habitat restoration activities, including planting and maintenance work. PG&E also contracted with a Restoration Ecologist (RE) to oversee the habitat restoration work and conduct monitoring and reporting. Minimum qualifications for the RC and RE team are defined in the Plan.

Figure 1: Project Location

Figure 2: Restoration Zones and Vegetation Sampling Locations

II. 2024 Revegetation Activities

The Plan presents a 5-year approach to restoring the restoration area. The following actions were performed in calendar year 2024 (Year-1) to replace the native vegetation removed during construction and to ensure the site is on a trajectory toward recovery.

A. Baseline Vegetation Monitoring

1. Reference Site Establishment

The reference site was utilized to determine an estimate of pre-disturbance native species cover.

If an onsite reference site is utilized, woody native perennial absolute cover at the site of 31 % (trees and shrubs) will be used, which results from an analysis of aerial imagery (National Agricultural Imagery Program [NAIP]) from prior to project disturbance. Sampling within the herbaceous component of the site will be used to estimate the remaining pre-disturbance for non-woody cover. Since the maintenance areas were subject to some limited disturbance (vehicular access, soil rutting/churning) during tree cutting, an adjustment will be made to the resultant native versus non-native cover to account for any advantage to non-native species over the previous growing season (native cover will be increased by 10% of measured absolute herbaceous cover and non-native cover will be reduced by 10%).

As an illustration, the scenario below assumes the following absolute cover data would be collected for the herbaceous layer (including woody seedlings/sprouts) within the remaining 69% of the project site (the portion not accounted for by aerial mapping of woody perennial cover): 40% native cover, 30% non-native cover, 30% bare ground/rock. Weighting the example measured values by 69% (the portion of the site not covered by woody perennials) results in 27.6%, 20.7%, and 20.7% absolute cover respectively (Table 1). With total weighted herbaceous cover at 48.3%, reducing estimated non-native cover by 4.8% (10% of total cover) and increasing native cover by 4.8% results in a pre-disturbance baseline estimate of 32.4% native herbaceous cover and 15.9% non-native cover in this example scenario.

Insert description of reference site. Revise methods.

Table 1. Adjusted Absolute Cover Calculation (if onsite reference is used)

	Woody Perennial Absolute Cover (from aerial)	Remaining Site Native Herbaceous Cover (Weighted Average)	Remaining Site Non-native Cover (Weighted Average)	Bare Ground (Weighted Average)	Total Site Cover (100%)
Measured Data	31	27.6	20.7	20.7	100
Adjusted for non- native advantage (estimated pre- disturbance baseline)	31	32.4	15.9	20.7	100

2. Vegetation Monitoring Methods

The vegetation monitoring occurred in May or June 2024. Sampling within the reference site took place along two 100-meter belt transects (or equivalent length of shorter transects if space is insufficient). Two 100-meter transects were placed within the active and passive restoration zones within areas deemed by the RE to be representative (Figure 2). Transect start and end points were marked in the field with t-posts unless reference site is offsite (in which case site will be recorded with GPS and photographs of landmarks to aid relocation, if needed).

Woody stems (including live or dead stumps within the restoration areas) were recorded within 1-meter on either side of the transects (2-meter total width) to measure stem density. Herbaceous species (and cover) were sampled within 1-meter quadrats every 10-meters along each transect, alternating sides of the transect.

Table 2. Vegetation Monitoring Data

	Woody Perennial Stem Count (average per acre)	Native Cover (Absolute)	Non-native Cover (Absolute)	Bare Ground (Absolute)	Total Site Cover (100%)
Reference Site (if off-site reference is used)			Total: (Cal-IPC High):		100
Maintenance Zone			Total: (Cal-IPC High):		100
Passive Zone			Total: (Cal-IPC High):		100
Active Zone			Total: (Cal-IPC High):		100

Summarize general (qualitative) site conditions. Discuss and zone reclassifications. Additional data tables as needed.

3. Photo Documentation

Permanent photographic documentation locations were established, marked with t-posts, and recorded with GPS at six representative vantage points within the restoration areas and at each transect sampling locations (Figure X; Appendix A). Date, location, and bearing were recorded for each photo point.

B. Seed and Plant Materials Collection and Installation

1. Collection

Seed and cuttings were collected by qualified vendor(s) within the project site include dates. Fruit maturity was monitored ahead of and throughout the collection season (April through August in 2024) by the qualified vendor to ensure collection timing was optimized.

Scientific Name	Common Name	Material Size	Quantity Installed in 2024	Quantity Remaining in Inventory

An overall average spacing of 15 feet (ft) was utilized between plants (including naturally recruiting individual perennial native plants); however, planting locations were field-fit to account for rocks and shallow soil substrate.

Foliage protection (tree tubes or wire cages) was provided on XX plants/species to prevent herbivore damage. Wire pin flags were used to mark locations of container plants to facilitate maintenance and irrigation (described below).

6. Maintenance

Maintenance included activities such as irrigation, installation/repair of herbivore protection, weed abatement, and replanting.

1. Irrigation

Irrigation consisted of a watering system, dates, quantities, etc.

2. Weed Management

Target species include all non-native plant species with a Cal-IPC rating of “High” or non-native plant species otherwise found by PG&E and/or the RE to be impacting restoration site success or posing a risk to maintaining defensible space. Manual control of target species (string trimming, selective mowing) was performed by qualified vendor on dates.

3. Restoration Site Signage

Informational signage was installed at four locations along the restoration site to inform site visitors that access is restricted (Figure X).

III. Discussion and Recommendations

A. Annual Vegetation Monitoring Results

Discuss quantitative and qualitative results.

B. Recommendations for 2025

Seed/propagule collection, storage, bulking and seeding will be repeated in 2025.

1. Seed Collection or Bulking

Recommendations text.

2. Container Plant Production

Recommendations text.

3. Maintenance

Recommendations text.

IV. References Cited

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Appendix A

Photo Documentation

Appendix B

Checklist of Plant Species Observed in Restoration Area

Botanical Name	Common Name	Growth form	Observed in 2024?
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EXHIBIT B

Integrated Vegetation Management Plan

Weed Management Plan

Applying Integrated Vegetation Management Principles at I-194D

PG&E is proposing an Integrated Vegetation Management Program (IVMP) which would include the use of both mechanical control and herbicide applications to maintain the site and enhance the populations of native vegetation at the project site at the recently constructed liquified natural gas (LNG) facility in Nevada County, California associated with project I-194D. The IVMP strategy would be two-fold, one for the graveled areas along the access road and inside the fenced gas facility and the other for outside the facility in the restoration area.

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The intent of this IVMP is to maintain the project site to ensure the safe and reliable operation of the facility while enhancing the restoration area, including benefits to habitat for both wildlife and native plants.

Restoration Area

Current populations of invasive and non-native plants need to be managed. Herbicide treatment along with mechanical treatment methods are necessary for success. Currently, Goatgrass (*Aegilops spp*), Yellow starthistle (*Centaurea spp*), American pokeweed (*Phytolacca americana*), Tree of Heaven (*Ailanthus altissima*), Scotch broom (*Cytisus scoparius*) and Himalayan blackberry (*Rubus Armeniacus*) are present on site and will be the most challenging to control if left unchecked. These species will become more pervasive making control more difficult and costly. Management tools including herbicide application, mechanical removal, application method, and timing of application will all be considered to minimize adverse effects to the desirable species present. It is expected some adaptation of these management tools may be necessary as site conditions change. IVM is about an adaptive strategy. PG&E will maintain a diverse toolbox. Having the appropriate tools, specific to the site and species present will prove necessary for success.

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