

Decision 19-03-018 March 28, 2019

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of PACIFIC GAS AND
ELECTRIC COMPANY, a California
Landing 115kV Reconductoring Project
(U39E).

Application 17-12-010

**DECISION GRANTING PERMIT TO CONSTRUCT THE
RAVENSWOOD-COOLEY LANDING 115kV
RECONDUCTORING PROJECT**

Summary

This decision grants Pacific Gas and Electric Company's request for a permit to construct the Ravenswood-Cooley Landing 115 kilovolt Reconductoring Project. This proceeding is closed.

1. Proposed Project

Pursuant to Section IX(B) of General Order 131-D (GO 131-D) of the California Public Utilities Commission (Commission), and Rules 2.1 through 2.5 and 3.1 of the Commission's Rules of Practice and Procedure (Rules), Pacific Gas and Electric Company (PG&E) requests a permit to construct (PTC) to reinforce

the electric transmission system in a portion of the Southeastern Peninsula¹ area 115 kilovolt (kV) transmission system with new conductors and related modifications to existing steel lattice towers and existing substation equipment. The Ravenswood-Cooley Landing Line is a double-circuit tower line design supported by nine lattice steel towers between PG&E's Ravenswood Substation in Menlo Park and Cooley Landing Substation in East Palo Alto on the southeastern portion of the San Francisco Peninsula.

2. Procedural Background

PG&E filed Application (A.) 17-12-010 on December 15, 2017. On December 17, 2017 PG&E filed a Compliance Filing including a declaration of advertising, posting, and mailing to affected governmental bodies and property owners giving notice of the application, as required by General Order (GO) 131-D, Section XI.A. No protests or responses to the application were filed.

On August 31, 2018, the California Public Utilities Commission's (CPUC's) Energy Division circulated a Notice of Intent (NOI) to adopt a Mitigated Negative Declaration (MND) for the project to the State Clearinghouse, Responsible and Trustee Agencies, Property Owners, and Interested Parties, and released the draft MND/Initial Study (IS) for a 30-day public review and comment period, in compliance with the California Environmental Quality Act (CEQA) and CPUC Rule 2.4. Copies of the draft MND/IS were made available online and for public review at the East Palo Alto and City of Menlo Park

¹ The Southeastern Peninsula area includes the cities of Belmont, San Carlos, Redwood City, Atherton, Menlo Park, East Palo Alto and Palo Alto. Final IS/MND at 1-2, *see also* Application of PG&E for a Permit to Construct The Ravenswood-Cooley Landing 115 kV Reconductoring Project at 2, filed December 15, 2017.

libraries, the PG&E Customer center in San Carlos and the CPUC Energy Division.²

Five comment letters were received from Federal, State and local agencies and PG&E.³ Comments from the Federal Aviation Administration (FAA) explained the criteria for notifying the FAA of the proposal. It is noted in the IS/MND that PG&E must comply with applicable FAA regulations and file necessary forms electronically. Comments from California Department of Transportation (Caltrans) noted its policies, transportation management plans, transportation permits, and encroachment permits. San Francisco Public Utilities Commission described permit requirements for areas in its jurisdiction and biological resource concerns. The City of East Palo Alto noted the requirements for visual simulations and presentation to City Council prior to encroachment or building permit issuance. PG&E provided minor clarifying comments and suggested revisions to the IS/MND.

As required by CEQA, all comments were considered in the final environmental document, and the CPUC provided written responses to all comments. Energy Division issued the Final IS/MND on November 7, 2018. Revisions to the Draft IS/MND included editorial changes, minor changes to one mitigation measure and technical clarifications and corrections. The minor revisions to the mitigation measure clarify the measure, and the final measure will avoid or reduce the impact to at least the same degree as, or to a greater

² <http://www.cpuc.ca.gov/environment/info/CEC/ravenswoodcooley/index.htm>

³ Final IS/MND, Section 7 - Comment letters were received from Federal Aviation Administration, Caltrans, San Francisco Public Utilities Commission, City of East Palo Alto, and PG&E.

degree than, the original measure and will not create any adverse effects of its own.

3. Scope of Issues

To issue a PTC pursuant to GO 131-D, the CPUC must find that it can be seen with certainty that there is no possibility that the construction of those facilities may have a significant effect on the environment or that the project is otherwise exempt from CEQA and does not require the adoption of a final EIR or Negative Declaration. In evaluating whether to approve the project, CEQA requires the lead agency⁴ (the CPUC in this case) to conduct a review to identify significant environmental impacts of the project and ways to avoid or reduce any significant environmental impacts. If the initial study shows that there is no substantial evidence that the proposed project may have a significant effect on the environment, or if the initial study identifies potentially significant effects and the project proponent makes or agrees to revisions to the project plan that will reduce all project-related environmental impacts to less-than-significant levels, then the lead agency shall prepare a negative declaration or MND, subject to public notice and the opportunity for the public review and comment. (CEQA Guidelines §§ 15070-15073.)

⁴ The lead agency is the public agency that has the principal responsibility for carrying out or approving a project. The lead agency also must decide whether an EIR or Negative Declaration will be required for the project and prepare the appropriate environmental document. CEQA Guidelines (Cal. Code Regs. Tit. 14, Div. 6, Ch.3) § 15367.

CEQA requires that, prior to approving the project, the lead agency consider the MND along with any comments received during the public review process, and that the lead agency adopt the MND only if it finds on the basis of the whole record that there is no substantial evidence that the project will have a significant effect on the environment and that the MND reflects the lead agency's independent judgment and analysis. (CEQA Guidelines § 15074(a)-(b)). If the lead agency adopts an MND, CEQA requires that it also adopt a program for monitoring or reporting on the changes or conditions required to mitigate or avoid significant environmental effects. (CEQA Guidelines § 15074(d).)

In addition, pursuant to GO 131-D and Decision (D.) 06-01-042, the Commission will not certify a project unless its design is in compliance with the Commission's policies governing the mitigation of electromagnetic field (EMF) effects using low-cost and no-cost measures.

As described previously, the Commission has prepared a Final IS/MND for the proposed project. Accordingly, the following issues will be determined in this proceeding:

1. What are the significant environmental impacts of the proposed project, if any?
2. Are there potentially feasible mitigation measures that will eliminate or lessen the identified significant environmental impacts?
3. As between the proposed project and the project alternatives, which is environmentally superior?
4. Are the mitigation measures or environmentally superior project alternatives infeasible?
5. To the extent that the proposed project and/or project alternatives result in significant and unavoidable impacts, are there overriding considerations that nevertheless merit

- commission approval of the proposed project or project alternative?
6. Did the Commission review and consider the environmental document (EIR or MND), was the environmental document completed in compliance with CEQA, and does it reflect the Commission's independent judgment?
 7. Is the proposed project and/or environmentally superior project alternative designed in compliance with the Commission's policies governing the mitigation of EMF effects using low-cost and no-cost measures?

4. Environmental Impacts

Here, the Final MND for the Proposed Project identified mitigation measures for (1) Biological Resources,⁵ (2) Noise,⁶ (3) Transportation and Traffic.⁷ These are all mitigation measures for potential impacts which may arise during, and after the construction phase of the Proposed Project. The draft Mitigation Monitoring Plan⁸ in the Final Mitigated Negative Declaration provides an overview of the mitigation monitoring, compliance, and reporting program (MMCRP) that will be prepared after project approval to ensure that the identified mitigation measures are properly implemented during project construction. With PG&E's implementation of the identified mitigation measures and compliance with the Plan, all project-related environmental impacts would be avoided or reduced to a less-than-significant level.

⁵ Final IS/MND, Section 5.4 at 5.4-1 to 5.4-42.

⁶ *Ibid.* Section 5.12 at 5.12-1 to 5.12-17.

⁷ *Ibid.* Section 5.16 at 5.16-1 to 5.12-18.

⁸ *Ibid.* Section 6 at 6-1 to 6-22.

Since circulation of the Draft IS/MND, there have been no “substantial revisions” to the MND, as defined in CEQA Guidelines Section 15073.5, and there is no evidence the Project may have a significant impact on the environment that cannot be mitigated or avoided. Therefore, the CPUC finds that recirculation of the MND is not required pursuant to State CEQA Guidelines Section 15073.5 and that based on the whole record before the CPUC (including the initial study and comments received), there is no substantial evidence that the project will have a significant effect on the environment. Additionally, the MND reflects the CPUC’s independent judgment and analysis.

The mitigation measures (Attachment A to this decision) would reduce or eliminate the potentially significant environmental impacts of the Proposed Project and meet the requirements of CEQA Guidelines § 15126.4.

5. Electric and Magnetic Field Management Plan

Section X(A) of GO 131-D requires that applications for a PTC include a description of the measures taken or proposed by the utility to reduce the potential exposure to electric and magnetic fields (EMF) generated by the proposed facilities. In accordance with Section X(A) of GO 131-D, CPUC D.06-01-042 (EMF Decision), and PG&E’s EMF Design Guidelines prepared in accordance with the EMF Decision, PG&E is required to prepare a Field Management Plan (FMP) that identifies the “no-cost” and “low-cost” magnetic field reduction measures proposed as part of the final engineering design for the project. Low-cost measures have been defined as mitigation measures that cost 4% or less of the total project cost, which is also referred to as the 4% benchmark.⁹

⁹ D.06-01-042 defines “low-cost” measures to mitigate EMF exposure for new utility transmission and substation projects.

PG&E's "EMF Design Guidelines for Electrical Facilities," based on D.06-01-042, exempts projects that are located exclusively adjacent to undeveloped land from the requirement to consider no-cost and low-cost EMF reduction measures. In the case of the Project, the adjacent land use next to the right-of-way for the Project is undeveloped land.¹⁰ Accordingly, no EMF reduction measures were proposed for the Project.

6. Administrative Matters

It may be necessary to refine the exact locations of some work areas and access routes at the time of construction based on final engineering and design specifications, and to address any unforeseeable land use or environmental changes that could occur between PG&E's application submittal (December 2017) and the start of proposed construction activities (September 2020). The extent of such refinements should be minor, restricted to the project study area, and subject to applicable environmental requirements and resources avoidance. Work area and access route refinements should be coordinated in advance with the CPUC to ensure consistency with the analysis presented in the MND. Procedures for minor project refinements are described in the Final MND/IS, in Section 4.4 (Minor Project Refinements) in the Mitigation Monitoring Plan. Factors that may require project refinements include:

- Changes in land use (*i.e.*, agricultural operations or property development);
- Avoidance of sensitive resources identified during pre-construction surveys or an inadvertent discovery;

¹⁰ Final IS/MND, Section 4.17.

- Avoidance of unnecessary vegetation or ground disturbance; and
- Avoidance of hazards or others safety considerations.

The CPUC, along with the CPUC's designated Project Manager and environmental monitor, will evaluate any proposed deviations from the CPUC-approved project to ensure they are consistent with CEQA requirements. Depending on the nature and extent, a proposed deviation could be processed as a Minor Project Refinement or be the subject of a petition for modification that PG&E would submit to the CPUC. Minor Project Refinements are strictly limited to minor deviations that do not trigger additional permit requirements, do not increase the severity of a significant impact, or create a new significant impact, and are within the geographic scope evaluated in the MND.

If a project refinement would create or have the potential to create a new significant impact, increase the severity of a significant impact, or occur outside the geographic area evaluated in the MND, PG&E should submit a petition for modification. The CPUC would evaluate the petition under CEQA, to determine what form of supplemental environmental review is required.

6. Categorization and Need for Hearing

Resolution ALJ 176-3369 preliminarily determined that this proceeding should be categorized as ratesetting and that a hearing was necessary. We confirm that this proceeding is ratesetting. We change the preliminary determination regarding hearings, since no material factual issues were presented in the scope of this proceeding. We determine that hearings are not necessary.

7. Waiver of Comment Period

This is an uncontested matter in which the decision grants the relief requested. Accordingly, pursuant to Section 311(g)(2) of the Public Utilities Code

and Rule 14.6(c)(2) of the Commission's Rules of Practice and Procedure, the otherwise applicable 30-day period for public review and comment is waived.

8. Assignment of Proceeding

Liane Randolph is the assigned Commissioner and Mary McKenzie is the assigned Administrative Law Judge in this proceeding.

Findings of Fact

1. The proposed project will have either no significant impacts or less than significant impacts with respect to Air Quality, Greenhouse Gas Emissions, Population and Housing, Aesthetics, Agriculture and Forestry Resources, Cultural and tribal Cultural resources, Land Use/Planning, Hazards/Hazardous Materials, Mineral Resources, Public Services, Geology/Soils, Hydrology/Water Quality, Recreation, and Utilities/Service Systems.

2. With the implementation of the mitigation measures identified in the Mitigation Monitoring Plan in the Final IS/MND and attached to this order, potentially significant impacts with respect to Biological Resources, Noise, and Transportation and Traffic, will be reduced to less than significant levels.

3. The proposed project is located in and adjacent to undeveloped land and no EMF measures are required.

4. The Final MND/IS was completed in compliance with CEQA requirements.

5. The CPUC has reviewed and considered the information contained in the Final MND/IS and finds on the basis of the whole record before the CPUC (including the initial study and comments received), there is no substantial evidence that the project will have a significant effect on the environment.

6. The Final MND/IS reflects the CPUC's independent judgment and analysis.

7. The minor revisions to the mitigation measures clarify the measures, and the final measures will avoid or reduce the impact to at least the same degree as, or to a greater degree than, the original measures and will not create any adverse effects of its own.

Conclusions of Law

1. PG&E should be granted a permit to construct the Ravenswood – Cooley Landing 115 kV Reconductoring Project in conformance with the mitigation measures attached to this order.

2. The proceeding should be categorized as ratesetting.

3. Hearings are not needed.

4. This order should be effective immediately.

O R D E R

IT IS ORDERED that:

1. The California Public Utilities Commission adopts the Final Mitigated Negative Declaration/Initial Study prepared for the Ravenswood – Cooley Landing 115 kilovolts Reconductoring Project Reconductoring Project.

2. Pacific Gas and Electric Company is granted a permit to construct the Ravenswood – Cooley Landing 115 kilovolts Reconductoring Project in conformance with the mitigation measures attached to this order.

3. The mitigation measures, included as part of the Final Mitigated Negative Declaration/Initial Study and attached this order, are adopted.

4. Pacific Gas and Electric Company may request, and Energy Division may approve, minor project refinements which meet the criteria described in Section 4.4 (Minor Project Refinements) in the Mitigation, Monitoring and

Reporting Program that may be necessary to complete the Ravenswood – Cooley Landing 115 kilovolts Reconductoring Project due to final engineering or other reasons. A petition to modify this decision is required for all other project changes.

5. Pacific Gas and Electric Company must meet all applicable requirements of General Orders 95 and 165 when constructing the Ravenswood – Cooley Landing 115 kilovolts Reconductoring Project.

6. Application 17-12-010 is categorized as ratesetting.

7. Hearings are not necessary.

8. Application 17-12-010 is closed.

This order is effective immediately.

Dated March 28, 2019, at San Francisco, California

MICHAEL PICKER

President

LIANE M. RANDOLPH

MARTHA GUZMAN ACEVES

CLIFFORD RECHTSCHAFFEN

GENEVIEVE SHIROMA

Commissioners

ATTACHMENT A

FMND Mitigated Measures
Ravenswood-Cooley 115 kV Reconductoring Project

Application No. A-17-12-010

MM BIO-1: General Avoidance of Biological Resource Impacts. (Supersedes APM BIO-1).

PG&E will implement field protocols and avoidance and minimization measures to reduce impacts on covered species and sensitive natural communities. This MM consists of the following components:

- **Worker Environmental Awareness Program (WEAP).** PG&E will conduct environmental training for all construction and on-site personnel prior to the beginning of site work. The WEAP training will be presented by a CPUC-approved, qualified biologist. All construction crew members and contractors who attend the training will sign a form indicating that they attended the training and understood the information. Follow-up training will be conducted as needed; new workers will attend WEAP training prior to beginning at the work site.

Training will include a discussion of the avoidance and minimization measures that are being implemented to protect biological resources, as well as the terms and conditions of permits that apply to the project. Training will include information on the federal and state Endangered Species Acts and the consequences of noncompliance with these acts. Under this program, workers will be informed about the presence, life history, and habitat requirements of all listed and special-status species with a potential to occur in the vicinity, with a focus on those species that could be affected within the project area. Training will also include information on state and federal laws protecting nesting birds, wetlands, and other water resources, as applicable and appropriate to the project. Additionally, personnel will be trained for situations where it is necessary to contact a qualified biologist (e.g., should any sensitive biological resources such as an active nest be found during construction). If sensitive resources are found, the qualified biologist will provide guidelines for the personnel to avoid impacts on them.

All WEAP participants will receive a brochure that outlines all this information including contact information for the appropriate environmental personnel. A record of all trained personnel will be kept on site, and a sticker indicating training completion will be worn on all worker hard hats. A copy of the training and brochure will be provided to CPUC prior to the start of construction for

project files.

- **Conservation Landowner Notification.** PG&E will notify conservation land owner at least two business days prior to conducting covered activities on protected lands (state and federally owned wildlife areas, ecological reserves, or conservation areas); more notice will be provided if required by other permits.
 - **Litter and trash management.** All food scraps, wrappers, food containers, cans, bottles, and other trash from the project area will be deposited in closed animal-proof trash containers and removed from the project site daily. Prohibit open fires (such as barbecues) at work sites.
 - **Parking and vehicle speed limit.** Vehicles and equipment will be parked on pavement, existing roads, and previously disturbed or developed areas or work areas. Off-road parking will only be permitted in previously identified and designated work areas. Vehicle speeds on unpaved roads will not exceed 15 miles per hour.
 - **Access route and work area limitations.** Vehicles will be confined to established roadways and existing access roads, pre-approved temporary access routes, existing boardwalks, and designated matted work areas. Access routes and construction work areas will be limited to the minimum necessary to safely construct the project.
 - **Maintenance and refueling.** All equipment will be maintained to minimize the potential for leaks of automotive fluids such as fuels, solvents, or oils. All refueling and maintenance of vehicles and other construction equipment will be restricted to designated staging areas located at least 100 feet from any down-gradient aquatic habitat, unless otherwise isolated from habitat by secondary containment. Vehicles and equipment operated adjacent to marshlands and open water will be checked daily to prevent leaks of materials that, if introduced to the water, could be harmful to aquatic life. Proper spill prevention and cleanup materials will be maintained in all refueling areas and work areas.
 - **Pets and firearms.** No pets, firearms, hunting or fishing will be permitted at the project site.
 - **Cover pipes and excavations.** Minimize potential for covered species to seek refuge or shelter in pipes and excavations. Inspect pipes, of diameter wide enough to be entered by a covered species that could inhabit the area where pipes are stored, for wildlife species prior to moving pipes and culverts. Fit open trenches or steep-walled holes with escape ramps of plywood boards or sloped earthen ramps at each end if left open overnight. Field crews will search open trenches or steep-walled holes every morning prior to initiating daily activities to ensure wildlife are not trapped. If any wildlife are found, a biologist will be notified and will relocate the species to adjacent habitat or the species will be
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allowed to naturally disperse, as determined by a biologist.

MM BIO-2: Avoid and Minimize Impacts on Special-status Plant Species.

(Supersedes **APM BIO-4**). PG&E will implement the following measures to minimize impacts on marsh habitat potentially suitable for special-status plant species:

- As part of the WEAP, include information on the identification of noxious weeds and invasive plants, the importance of noxious-weed and invasive plant control, and measures to minimize their spread. Training will include the following BMPs [best management practices] to avoid or minimize the spread of invasive plants and noxious weeds: (1) avoid working in invasive plant or noxious weed infested areas or prioritize activities so that infested areas are worked in last; (2) keep records of road maintenance activities including location and source of grading material; (3) maintain gravel and soil spoil piles free of invasive plants or noxious weeds; use areas known to be weed-free for staging and laydown areas; (4) minimize soil disturbance to the extent possible; (5) materials used for erosion control will be certified weed free (i.e. straw wattles, gravel, fill material, etc.); when restoring a site after disturbance, use a native seed mix; (6) drive on and park on established roads as much as possible; (7) off-road equipment that is not local to the project area will arrive onsite clean and free of soil and plant parts; and (8) clean clothing, footwear, and gear before moving from an infested area to a non-infested area. In addition, WEAP training will include information on invasive weeds that are known to occur in the vicinity, including stinkwort (*Dittrichia graveolens*), non-native spartina (*Spartina* spp.), and Algerian sea lavender (*Limonium ramosissimum*). The WEAP training program and brochure will include photographs, description, natural history information, and map showing the species' distribution in relation to project activities.
- Prior to commencement of activities located on or adjacent to non-paved surfaces a biologist will flag known populations of noxious weeds and invasive plants in the work areas.
- To minimize introduction and spread of noxious weeds and invasive plants, PG&E will avoid moving weed-infested gravel, rock, and other fill materials to relatively weed-free locations. PG&E will use certified weed-free straw and mulch for erosion-control projects. PG&E will maintain stockpiled, uninfested material in a weed-free condition.
- PG&E will work in a direction from uninfested areas to infested areas as much as practical.
- PG&E will minimize soil disturbance and the removal of vegetation during construction, maintenance and other ground-disturbing activities to the extent practicable. Vehicles and equipment should remain on established roads as

much as is practicable.

- PG&E will stage in areas not infested with weeds or treat for weed removal prior to using an infested area.
- If new noxious weed or invasive plant observations are detected within or adjacent to project area, including the Ravenswood OSP, during the project construction and ongoing maintenance activities, the populations will be mapped and reported to the appropriate agency contact. PG&E will conduct post-construction monitoring of any disturbed soils in the spring following completion of construction for any invasive species that inadvertently have been introduced. PG&E will report findings of any invasive plants or noxious weeds detected during project construction and/or the spring after construction to the contact for the Ravenswood OSP, Coty Sifuentes-Winters, Senior Resource Management Specialist, csifuentes@openspace.org or agency-identified alternative.

MM NO-1: Notices, Noise-Reducing Practices, and Complaint Response Process. PG&E shall employ standard noise-reducing construction practices including, but not limited to, the following:

- Ensure that all equipment is equipped with mufflers that meet or exceed factory new-equipment standards.
- Locate stationary equipment as far as practical from noise-sensitive receptors.
- Limit unnecessary engine idling.
- Limit all land-based construction activity near noise-sensitive receptors to daytime hours unless required for safety or to comply with line clearance requirements. Limit all helicopter activity to daytime hours.
- Notification:
 - Residences and business owners affected by daytime helicopter activities within 1,500 feet of Staging (Landing) Areas 3 and 4 and flight paths shall be notified at least 7 days in advance by mail, personal visit, or door hanger, and informed of the expected work schedule.
 - Residences and business owners within 1,500 feet of active nighttime reconductoring sites and staging areas shall be notified at least 7 days in advance of nighttime work by mail, personal visit, or door hanger, and informed of the expected work schedule.
 - PG&E shall post notices in public areas, including recreational use areas, within 500 feet of the project alignment and construction work areas.
 - In this notice, PG&E shall state that it will perform this activity in a manner to ensure excessive noise is avoided as much as practicable. PG&E shall provide tips to homeowners and business owners on reducing noise intrusion, for example, moving indoors, closing windows and doors facing the construction and helicopter paths. PG&E shall note the efficacy of these tips in reducing noise.

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- Temporary sound barriers shall be installed and maintained by the construction contractor for nighttime work conducted within 1,000 feet of sensitive receptors. Temporary sound barriers shall consist of either sound blankets at the noise source or other sound barriers/techniques such as acoustic padding or acoustic walls placed near the noise source. Barriers shall be placed such that the line-of-sight between the construction equipment and adjacent sensitive land uses is blocked. As needed, trucks used during nighttime construction work shall be equipped with either a white noise or variable volume back up alarm. If a low volume alarm cannot be installed, the alarm shall be disabled, and instead, a flagman shall be used for safe movement of trucks.
 - PG&E shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring receptors, including residents, about noise construction disturbance. PG&E shall also establish a toll-free telephone number for receiving questions or complaints during construction and develop procedures for responding to callers. Procedures for reaching the public liaison officer via telephone or in person shall be included in the above notices and posted conspicuously at the construction site(s). PG&E shall address any daytime-related noise complaint within one week of when the complaint is filed. If a complaint is related to nighttime construction work, PG&E shall address it within 24 hours of the filing of the complaint. PG&E shall provide monthly reports with records of complaints and responses to the CPUC. These reports shall be provided to CPUC within 15 days of the end of the month.
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MM TRA-1: Traffic Management Implementation. (Supersedes **APM TRA-1**). PG&E will obtain any necessary transportation and encroachment permits from Caltrans and the local jurisdictions, as required, including those related to the State Route 84 crossing and the transport of oversized loads, and will implement temporary traffic controls as required to prevent excessive congestion or traffic hazards during construction. Construction activities that are along or that cross local roadways will follow local jurisdictional encroachment permit requirements and traffic controls in the form of signs, cones, and flaggers to minimize impacts on traffic, transportation, and emergency access in the project area. When working on state highways, PG&E will follow traffic control guidelines outlined in the *California Manual on Uniform Traffic Control Devices*, 2018 edition. A Caltrans-approved Transportation Management Plan will be prepared to address impacts to vehicular, bicycle, and pedestrian traffic caused by traffic restrictions or detours. The Plan must address the following:

- Pedestrian and bicycle access through the construction site (between staging areas 2a and 2b and other locations along the alignment) will be maintained at all times and will adhere to the Americans with Disabilities Act (ADA) regulations and comply with Caltrans' Temporary Pedestrian Facilities Handbook.
 - Prior to construction PG&E will survey and photograph portions of the Bay Trail that will be used during construction. If project-related construction activities damage portions of the Bay Trail, PG&E will restore those facilities in compliance with current design standards and ADA regulations.
 - Lane closures will occur during off-peak traffic hours (i.e. 9:00 a.m. to 4:00 p.m. and 6:00 p.m. to 7:00 a.m.)
 - Advance public notification of lane closures will be provided if transit routes require temporary rerouting. Public notification will include lane closure schedule, location, and duration of public transit reroute.
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- Project-related traffic will be required to use northbound University Avenue to enter and depart from the SFPUC service road, unless a flagger is present to direct traffic on University Avenue while the vehicles turn left into or out of the service road driveway.

PG&E will include plans to coordinate all construction activities with emergency service providers in the area prior to construction to ensure construction activities and associated lane closures and detours will not significantly affect emergency response vehicles. Emergency service providers will be notified of the timing, location, and duration of construction activities. PG&E will submit verification of its consultation with emergency service providers to the CPUC. All roads will remain passable to emergency service vehicles at all times. of the location, date, time and duration of lane closures. PG&E will ensure emergency access is maintained at all times during lane closures.

MM TRA-2: Air Transit Coordination (Supersedes **APM TRA-2**). PG&E will implement the following protocols related to helicopter use during construction and air traffic:

- PG&E's helicopter operator will comply with all applicable FAA regulations and will contact the local FAA office to determine if a Congested Area Plan (CAP) is needed. If a CAP is needed, the local FAA office will define the scope of action required in the CAP and will coordinate with the helicopter operator to comply with all requirements.
 - PG&E's helicopter operator will coordinate all project helicopter operations with local airports before and during project construction. Coordination will include working with the Palo Alto Airport Manager for the issuance of a NOTAM informing pilots departing from the nearest departure runway of helicopter activity during project construction and reconductoring activities.
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(END OF ATTACHMENT A)