

APPENDIX H
PG&E PROPOSED SUPPLEMENTAL CONSTRUCTION
MITIGATION MEASURES
MARCH 3, 2014

Upper North Fork Feather River
Hydroelectric Project

Draft Environmental Impact Report

State Water Resources Control Board
Sacramento, CA

November 2014

Barnes, Peter@Waterboards

From: Klobas, John <JTK2@pge.com>
Sent: Monday, March 03, 2014 4:24 PM
To: Barnes, Peter@Waterboards; TAJ3@pge.com
Cc: Wetzal, Jeff@Waterboards; Ragazzi, Erin@Waterboards
Subject: RE: Upper North Fork Feather River Hydroelectric Project, FERC No. 2105
Attachments: PGE Propose Mitigation Measures During Construction.docx

Peter,

Attached are PG&E's revised mitigation measures.

I would like to review the changes with you Peter so, I'll follow-up with a phone call Tuesday morning. (March 4th)

Thank you.

John Klobas, MBA, PMP

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From: Barnes, Peter@Waterboards [mailto:Peter.Barnes@waterboards.ca.gov]
Sent: Tuesday, February 04, 2014 10:47 AM
To: Jereb, Thomas; Klobas, John
Cc: Wetzal, Jeff@Waterboards; Ragazzi, Erin@Waterboards
Subject: Upper North Fork Feather River Hydroelectric Project, FERC No. 2105

Hi Tom,

The Upper North Fork Feather River Hydroelectric Project (Project), Federal Energy Regulatory Commission (FERC) Project No. 2105, is currently awaiting the issuance of a Clean Water Act Section 401 Water Quality Certification (401 Certification) from the State Water Resources Control Board. Prior to issuing a 401 Certification, the State Water Board must evaluate the environmental impacts of the project as required by the California Environmental Quality Act (CEQA).

The State Water Board has prepared a draft Environmental Impact Report in order to satisfy the requirements of CEQA. Through this process, the State Water Board has identified potentially significant impacts to resource areas outside of the State Water Board's purview: Air Quality, Traffic and Transportation, Noise, Vegetation and Wildlife, and Cultural Resources. Since these impacts occur in resource areas outside of the State Water Board's purview, implementation of these proposed mitigation measures cannot be required. Therefore, in an effort to limit the project's potentially significant impacts to the environment, the State Water Board is requesting that PG&E agree to implement the mitigation measures listed below.

It is State Water Board staff's understanding that PG&E typically implements measures similar to these on many of their projects. If PG&E is unable to agree to such measures, the State Water Board will identify impacts to the identified resource areas as significant.

Air Quality

Implement a Fugitive Dust and Emission Control Plan

During all construction activities, the PG&E will implement a fugitive dust and emissions control plan to minimize fugitive dust and particulate matter emissions. The plan will be approved by the Northern Sierra Air Quality Management District (AQMD) and comply with its rules and regulations. Measures identified in the plan will include, but are not limited to:

- *Watering inactive construction areas as needed to ensure dust control.*
- *Pursuant to the California Vehicle Code (Section 23114), cover or maintain adequate freeboard of all trucks hauling soil or other loose material to and from the activity area to ensure retention of materials within the truck bed (e.g., ensure 1 to 2 feet vertical distance between top of load and the trailer).*
- *Conducting excavation activities and other soil-disturbing activities will be conducted in phases to reduce the amount of bare soil exposed at any one time.*
- *Watering (using equipment or manually) all stockpiles of soil and rock, dirt/gravel roads, and exposed or disturbed soil surfaces, as necessary, to reduce airborne dust.*
- *Limiting vehicle speed limits on unpaved access roads or in activity areas to 15 miles per hour.*
- *Sweeping all paved access roads, parking areas, and staging areas on a regular basis using water sweepers.*
- *Suspending all ground-disturbing activities with the potential to generate dust when winds exceed 20 miles per hour.*
- *Designating a monitor to monitor dust control and order increased watering as necessary to prevent transport of dust offsite. This person would also respond to any citizen complaints. In the event that conditions become unfavorable, the monitor would have the authority to modify or slow down operation until conditions are acceptable again.*

Transportation and Traffic

Implement Traffic Control Plan

PG&E will implement a traffic control plan during construction activities to alert motorists to the activity areas and truck traffic. The plan will include details concerning construction routes, emergency access, reductions in speed limits through the construction zone, signage and appropriate traffic control devices, illumination during limited visibility, and use of safety clothing/vests to ensure visibility of construction workers by motorists. Additional elements of the plan include provisions that: signs will be posted along the highways near the activity areas to notify motorists about trucks exiting the highway, the locations of activity areas, and the duration of construction; and all traffic control measures will be removed at the end of construction.

Noise

Implement Noise Reduction Measures

During construction activities, the PG&E will implement measures to reduce construction-related noise. Noise reduction measures include, but are not limited to, the following:

- *Equip construction equipment with manufacturer's specified noise muffling devices or use newer construction equipment manufactured to reduce noise;*
- *Place stationary noise-generating equipment as far away as feasible from sensitive noise receptors or in an orientation that minimizes noise impacts (e.g., behind existing barriers, storage piles, unused equipment);*

- Turn off all engines when not in use;
- Maintain low vehicle speeds in and around the construction areas (less than 15 miles per hour); and
- Operate construction equipment only during daylight hours.

Vegetation and Wildlife

Prevent Weed Introduction

PG&E will implement measures throughout the construction phase to prevent the spread of weeds. These measures include, but are not limited to:

- When using imported erosion control materials (as opposed to rock and dirt berms), use only certified weed-free materials, mulch, and seed.
- Limit any import or export of fill to materials that are known to be weed free.
- Thoroughly wash all construction equipment prior to it entering the worksite. Inspect equipment to ensure that it is free of plant parts as well as soils, mud, or other debris that may carry weed seeds.
- Use a mix of native grasses, forbs, and non-persistent non-native species for seeding disturbed areas that would be subject to infestation by non-native and invasive plant species. Where appropriate, use a heavy application of mulch to discourage introduction of invasive plant species. Planting plugs of native grass species may also be used to accelerate occupation of disturbed sites and increase the likelihood of establishing a self-sustaining population of native plant species.

Avoid Disturbance of Special-Status Plants

PG&E will protect populations or individuals of special-status plants in the activity areas. To the extent feasible, ground-disturbing activities (e.g., vehicle traffic, equipment staging, and vegetation removal) in upland areas shall be limited to areas of barren habitat. Habitat types to be avoided shall be clearly delineated using exclusion fencing or flagging. If ground disturbance in non-barren habitat is expected, PG&E shall retain a qualified botanist prior to the onset of the first season of construction to conduct pre-construction surveys to determine if special-status plant species occur within the activity areas or adjacent habitats (out to approximately 250 feet). A minimum of two surveys shall be conducted during the blooming periods of potentially occurring plants to determine: (1) if the species is present; and (2) the quality, location, and extent of any populations.

If a special-status plant species is found within 250 feet of potential disturbance areas, the following measures will be implemented:

- Prior to the start of disturbance, exclusionary fencing will be erected around the known to occur. If necessary, a qualified botanist shall be present to assist with locating these special-status plant populations. The exclusionary fencing will be periodically inspected throughout each period of construction and be repaired as necessary.
- If a population cannot be fully avoided, PG&E will retain a qualified botanist to: (1) determine appropriate salvage and relocation measures; and (2) implement these measures in coordination with USFWS, CDFW, or USFS staff, as appropriate.

Avoid Disturbance of Special-Status Bat Roosts

PG&E shall be required to implement measures to avoid disturbance of special-status bat roosts or hibernacula in or near the activity areas during construction. To determine the presence of bat roosts or hibernacula, PG&E shall retain a qualified biologist to conduct a pre-construction survey in the activity areas and immediately adjacent suitable habitat. Activities that could disturb active roosts shall not proceed until the surveys have been completed. If no active roosts are found, no further action is needed. If an active maternity roost or hibernaculum is found, the tree or structure occupied by the roost will be retained, if feasible. Because bats are known to abandon young when disturbed, if a maternity roost is located, a qualified bat biologist will determine the extent of a construction-free zone to be implemented around the roost during the bat maternity roost season (March 1–July 31). CDFW will be notified of any active bat maternity roosts in the disturbance zones.

If the tree or structure with an active maternity roost cannot be avoided, it will be removed or demolished before bat maternity colonies form (i.e., prior to March 1) or after young are volant (flying) (i.e., after July

31). Trees with roosts that need to be removed will first be disturbed at dusk, just prior to removal that same evening, to allow bats to escape during the darker hours. If a non-breeding bat hibernaculum is found in a tree or structure to be razed, the individuals will be safely evicted under the direction of a qualified bat biologist by opening the roosting area to allow air flow through the cavity. Demolition or removal shall occur no sooner than the following day to allow bats to leave during dark hours, thus increasing their chance of finding new roosts and minimizing the potential for predation during daylight.

Avoid Disturbance of Ringtail Cats

PG&E shall be required to implement measures to avoid disturbance of active ringtail cat dens in or adjacent to the activity areas. To determine the presence of active dens, PG&E shall retain a qualified biologist to conduct a pre-construction survey for ringtail cats, including their dens, within the activity areas. Activities that could result in disturbance to active dens shall not proceed until the survey has been completed. If no active dens are found, no further action is needed.

If an active ringtail cat den is found, the tree occupied by the den shall be retained, if feasible. If tree removal is necessary, it shall commence outside of the breeding season (February 1 to August 30). Trees with dens that need to be removed shall first be disturbed at dusk, just prior to removal that same evening, to allow ringtail cats to escape during the darker hours. If a non-breeding den is found in a tree scheduled to be removed, the individuals will be safely evicted under the direction of a qualified biologist.

CULTURAL RESOURCES:

Implement Treatment Measures and Record Previously Undiscovered Resources

PG&E will comply with relevant measures in the Cultural Resources Management Plan (CRMP) and Programmatic Agreement if potential cultural resources are discovered during construction activities. If a discovery is made construction will cease immediately within the vicinity of the discovery and PG&E's Cultural Resources Specialist and Hydroelectric Superintendent will be notified immediately. The resource will be examined by a qualified professional archaeologist to determine if it is a cultural resource. Any cultural resources discovered during construction will be recorded according to accepted contemporary standards and evaluated to determine their eligibility for listing on the National Register of Historic Places (NRHP) and California Register of Historic Resources (CRHR). PG&E will identify any impacts on the resources and will identify specific treatment measures if eligible resources would be adversely affected. PG&E will consult with the State Historic Preservation Officer, the Lassen and Plumas National Forests (as appropriate), and the Greenville and Susanville Indian rancherias (and other Maidu organizations as appropriate) to determine the appropriate course of action. PG&E will implement any specific measures necessary to reduce adverse impacts, including data recovery and curation of recovered materials, protection in place by avoiding the resource, or interpretation of the resource to preserve its values.

Implement Treatment Measures for Human Remains

PG&E will comply with appropriate measures in the CRMP and Programmatic Agreement if human remains are discovered during construction activities. If a discovery is made, PG&E's Cultural Resources Specialist and Hydroelectric Superintendent, the Plumas County Coroner, the Greenville and Susanville Indian rancherias (and other Maidu organizations as appropriate), and the Native American Heritage Commission will be notified immediately. The ancestry of the remains will be determined if feasible and with minimal disturbance of the remains. All human remains and associated burial artifacts encountered will be protected and assessed in a respectful and dignified manner. If removal is necessary, it will be undertaken with a Maidu representative present (if appropriate), and the remains will be treated according to the provisions set forth in Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the California Public Resources Code.

Please let me know if you have any questions. Thank you for your time.

Sincerely,

Peter Barnes

Engineering Geologist
Water Quality Certification Program
Division of Water Rights
State Water Resources Control Board
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**PG&E Proposed Mitigation Measures for the
Upper North Fork Feather River Project
To Reduce the Impacts to a Less than Significant Level
March 3rd, 2014**

Air Quality Impacts During Construction

Construction projects could result in temporary air quality effects. During ground disturbing construction projects PG&E shall implement the following requirements:

- Construction access roads and the construction site will be sufficiently watered to prevent excessive amounts of dust.
- Pursuant to the California Vehicle Code (Section 23114), cover or maintain adequate freeboard of all trucks hauling soil or other loose material to and from the activity area to ensure retention of materials within the truck bed (e.g., ensure 1 to 2 feet vertical distance between top of load and the trailer).
- Suspend all ground-disturbing activities with the potential to generate dust when winds exceed 20 miles per hour.
- Designate a monitor to monitor dust control and order increased watering as necessary to prevent transport of dust offsite. This person would also respond to any citizen complaints. In the event that conditions become unfavorable, the monitor would have the authority to modify or slow down operation until conditions are acceptable again.
- After construction is complete the construction site will be seeded with native grasses or plants.
- Equipment engines will be maintained in good conditions and in proper tune as set forth in manufacturers' specifications.

Transportation and Traffic

Implement Traffic Control Plan

PG&E will implement a traffic control plan during construction activities to alert motorists to the activity areas and truck traffic. The plan will include details concerning construction routes, emergency access, reductions in speed limits through the construction zone, signage and appropriate traffic control devices, illumination during limited visibility, and use of safety clothing/vests to ensure visibility of construction workers by motorists. Additional elements of the plan include provisions that: signs will be posted along the highways near the activity areas to notify motorists about trucks exiting the highway, the locations of activity areas, and the duration of construction; and all traffic control measures will be removed at the end of construction.

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Noise

Implement Noise Reduction Measures

During construction activities, PG&E will implement measures to reduce construction-related noise. Noise reduction measures include, but are not limited to, the following:

- Equip construction equipment with manufacturer's specified noise muffling devices or use newer construction equipment manufactured to reduce noise;
- Place stationary noise-generating equipment as far away as feasible from sensitive noise receptors or in an orientation that minimizes noise impacts (e.g., behind existing barriers, storage piles, unused equipment);
- Turn off all engines when not in use;
- Maintain low vehicle speeds in and around the construction areas (less than 15 miles per hour)

Vegetation and Wildlife

Prevent Weed Introduction

PG&E will implement measures throughout the construction phase to prevent the spread of weeds. These measures include, but are not limited to:

- When using imported erosion control materials (as opposed to rock and dirt berms), use only certified weed-free materials, mulch, and seed.
- Limit any import or export of fill to materials that are known to be weed free.
- Thoroughly wash all construction equipment prior to it entering the worksite. Inspect equipment to ensure that it is free of plant parts as well as soils, mud, or other debris that may carry weed seeds.
- Use a mix of native grasses, forbs, and non-persistent non-native species for seeding disturbed areas that would be subject to infestation by non-native and invasive plant species. Where appropriate, use a heavy application of mulch to discourage introduction of invasive plant species. Planting plugs of native grass species may also be used to accelerate occupation of disturbed sites and increase the likelihood of establishing a self-sustaining population of native plant species.

Avoid Disturbance of Special-Status Plants

PG&E will protect populations or individuals of special-status plants in the activity areas. To the extent feasible, ground-disturbing activities (e.g., vehicle traffic, equipment staging, and vegetation removal) in upland areas shall be limited to areas of barren habitat. Habitat types to be avoided shall be clearly delineated using exclusion fencing or flagging. If ground disturbance in non-barren habitat is expected, PG&E shall retain a qualified botanist prior to the onset of the first season of construction to conduct pre-construction surveys of suitable habitat to determine if special-status plant species occur within the activity areas or adjacent habitats (out to approximately 10 feet). A minimum of two surveys shall be conducted during the blooming periods of potentially occurring plants, if one survey would not encompass the blooming period of all potentially occurring plants, to determine: (1) if the species is present; and (2) the quality, location, and extent of any populations.

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If a special-status plant species is found within 10 feet of potential disturbance areas, the following measures will be implemented:

- Prior to the start of disturbance, exclusionary fencing will be erected around the known occurrence. If necessary, a qualified botanist shall be present to assist with locating these special-status plant populations. The exclusionary fencing will be periodically inspected throughout each period of construction and be repaired as necessary.
- If a population cannot be fully avoided, PG&E will retain a qualified botanist to: (1) determine appropriate salvage and relocation measures; and (2) implement these measures in coordination with USFWS, CDFW, or USFS staff, as appropriate.

Avoid Disturbance of Special-Status Bat Roosts

PG&E shall be required to implement measures to avoid disturbance of special-status bat roosts or hibernacula in or near the activity areas during construction. To determine the presence of bat roosts or hibernacula, PG&E shall retain a qualified biologist to conduct a pre-construction survey of suitable habitat within the activity areas and immediately adjacent suitable habitat as applicable, as determined by the qualified biologist. Activities that could disturb active roosts of special status bats shall not proceed until the surveys have been completed. If no active roosts are found, no further action is needed. If an active special-status bat maternity roost or hibernaculum is found, the tree or structure occupied by the roost will be retained, if feasible. Because bats are known to abandon young when disturbed, if a maternity roost is located, a qualified bat biologist will determine the extent of a construction-free zone to be implemented around the roost during the bat maternity roost season (March 1–July 31). CDFW will be notified of any active bat maternity roosts in the disturbance zones.

If the tree or structure with an active special status bat maternity roost cannot be avoided, it will be removed or demolished before bat maternity colonies form (i.e., prior to March 1) or after young are volant (flying) (i.e., after July 31). The following disturbance protocol will be implemented for trees with non-breeding bat roost on the same day that removal will occur:

- Create noise and disturbance at the tree base such that roosting bats would experience vibration. Disturbance should be nearly continuous for two minutes, then another five minutes should pass with no disturbance to allow bats time to evacuate the tree. Create disturbance for another minute, and then wait another minute before felling the tree.

Avoid Disturbance of Ringtail Cats

PG&E shall be required to implement measures to avoid disturbance of active ringtail cat dens in or adjacent to the activity areas. To determine the presence of active dens, PG&E shall retain a qualified biologist to conduct a pre-construction survey for ringtail cats, including their dens, within suitable habitat associated with the activity areas. Activities that could result in disturbance to active dens shall not proceed until the survey has been completed. If no active dens are found, no further action is needed.

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If an active ringtail cat den is found, the tree occupied by the den shall be retained, if feasible. If tree removal is necessary, it shall commence outside of the breeding season (February 1 to August 30). Trees with dens that need to be removed shall first be disturbed at dusk, just prior to removal that same evening, to allow ringtail cats to escape during the darker hours. If a non-breeding den is found in a tree scheduled to be removed, the individuals will be safely evicted under the direction of a qualified biologist.

Cultural Resources:

Implement Treatment Measures and Record Previously Undiscovered Resources

PG&E will comply with relevant measures in the Cultural Resources Management Plan (CRMP) and Programmatic Agreement if potential cultural resources are discovered during construction activities. If a discovery is made construction will cease immediately within the vicinity of the discovery and PG&E's Cultural Resources Specialist and Hydroelectric Superintendent will be notified immediately. The find will be examined by a qualified professional archaeologist to determine if it is a cultural resource. Any cultural resources discovered during construction will be recorded according to accepted contemporary standards. If significant impacts to the resource are unavoidable it will be evaluated to determine eligibility for listing on the California Register of Historic Resources (CRHR). PG&E will identify any impacts on the resources and will identify specific treatment measures if eligible resources would be significantly impacted. PG&E will implement any specific measures necessary to avoid, reduce or mitigate significant impacts, including protection in place, interpretation, data recovery, or curation of recovered materials.

Implement Treatment Measures for Human Remains

PG&E will comply with appropriate measures in the CRMP and Programmatic Agreement if human remains are discovered during construction activities. If removal is necessary, remains will be treated according to the provisions set forth in Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the California Public Resources Code.