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# ONSITE RESTORATION PLAN FOR THE D-1502A ID-642G-4 L-301G MP 24.33 ILI INVESTIGATION DIG

MOSS LANDING, MONTEREY COUNTY, CALIFORNIA

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# INTRODUCTION

The Pacific Gas & Electric Company (PG&E) proposes to excavate and inspect an anomaly along an underground segment of Gas Transmission Pipeline 301G (L-301G) at Milepost 24.33, east of the community of Moss Landing, Monterey County, California (Figure 1). Inspection of the anomaly will require excavation in non-tidal brackish marsh, with associated construction staging and equipment/vehicle access in the marsh and adjacent uplands. Work in the non-tidal brackish marsh will only result in temporary impacts and involves no significant permanent impacts. Vegetation is planned to recover within 12 months from the initial disturbance barring drought, fire, cattle, or land modification by the landowner. One-to-one mitigation for temporary impacts to non-tidal brackish marsh will be completed through onsite revegetation. Mitigation for impacts to uplands is addressed in PG&E's Multi-Region Habitat Conservation Plan (MRHCP), through MRHCP Field Protocol Number 14 which requires restoration of uplands using native seed. This plan is prepared to describe methods for revegetation of non-tidal brackish marsh temporarily impacted by construction as well as follow-up maintenance and monitoring to ensure the success of revegetation efforts.

# **PROJECT DESCRIPTION**

Prior to excavation of the anomaly, two pipeline excavations (approximately 4 feet by 4 feet) will be required on either side of the investigation dig to identify girth welds to confirm the anomaly location. Inspection of the pipeline will require excavation of a bell hole (9 feet by 12 feet) up to 12-feet deep to expose the pipeline, investigate the anomaly, and complete any necessary repairs. Project materials and equipment will be staged and operated in an approximately 15,000-squarefoot work area surrounding the bell hole. Bell hole excavation and a portion of the associated workspace are within a non-tidal brackish marsh. An additional approximately 2,500-square-foot work area may be required in uplands west of the bell hole for sniff hole excavation (approximately 6 feet by 6 feet) in the event of a cut-out repair. The excavation sites will be accessed along overland access paths through surrounding agricultural fields. PG&E will use a backhoe and/or vacuum truck to expose the existing pipeline. Following the identification and inspection of the anomaly, repairs to the pipe may be required. Repairs could include, but may not be limited to, recoating, installation of a sleeve, or replacement of a segment of the pipeline. Following construction, the excavation will be backfilled with PG&E-approved fill surrounding the pipeline. To the extent feasible, matting will be used to preserve vegetation and topsoil. Native soil will be used for the remaining backfill, and the upper 18 inches of native topsoil removed during excavation will be stored on-site separate from subsoils and replaced upon project completion. However, the dig site contains contaminated soil and is subject to a soil management plan under the oversight of the Department of Toxic Substances Control (DTSC). Replacement of excavated soil may not be authorized under the soil management plan for the site. In this case, suitable soil will be imported to backfill the excavation, and material excavated from the site will be disposed of at an appropriate off-site location. Where possible, PG&E construction will use mats to reduce impacts to vegetation and soil.

PG&E may use the following equipment on the site: backhoe, vacuum truck, work trucks, compressor, welding truck, x-ray truck, and hand tools. Areas proposed for excavation and associated staging, operation, and repair, as well as upland staging areas and access routes, are defined as the work area for the purpose of this plan.

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# **EXISTING CONDITIONS**

The work area is within an agricultural pasture in northwestern Monterey County. Lands surrounding the work area are principally utilized for grazing. The work area includes upland ridges on the east and west sides, separated by a low valley which supports non-tidal brackish marsh. The low valley supports intermittent inundation, largely as a stormwater retention basin, receiving input of freshwater from surrounding agricultural lands during storm events. Brackish qualities of the marsh in the work area are the result of remnant alkaline substrates from historic tidal influence and intermittent input of saline water during extreme high-tide events. The marsh is not currently subject to regular tidal influence.

#### **Biological Conditions**

The work area is within the Central Coast subregion of the Central Western California Region of the California Floristic Province. Vegetation communities in the work area were characterized during field surveys completed in October 2022.

#### Non-native Annual Grassland/Grazed Agricultural Land

Upland agricultural land in the work area includes grazed pastures which support non-native annual grassland with a diverse assemblage of grasses and forbs. Uplands are found on the east and west sides of the work area, divided by the low valley with non-tidal brackish marsh. Uplands in the work area are dominated by non-native annual grassland, but also include a small area of shrub cover adjacent to the east side of the marsh. Dominant shrubs include coyote brush (*Baccharis pilularis*), California sagebrush (*Artemesia californica*), black sage (*Salvia mellifera*), and golden yarrow (*Eriophyllum confertiflorum*). Vegetation within the annual grasslands includes red brome (*Bromus madritensis* ssp. *rubra*), Bermuda grass (*Cynodon dactylon*), creeping wild rye (*Leymus triticoides*), wild radish (*Raphanus sativa*), black mustard (*Brassica nigra*), redstem filaree (*Erodium cicutarium*), perennial ryegrass (*Lolium perenne*), Italian thistle (*Carduus pycnocephalus*), jimson weed (*Datura stramonium*), maritime plantain (*Plantago maritima*), blue-eyed grass (*Sisyrinchium bellum*), and deerweed (*Acmispon glaber*).

Sparse inclusions of vegetation associated with the brackish marsh, such as alkali heath (*Frankenia salina*) and saltgrass (*Distichlis spicata*), are also present near the upland/wetland ecotone. This community was analyzed in the Environmental Impact Statement (EIS) for PG&E's MRHCP.

#### Brackish Marsh

Non-tidal brackish marsh is present across the central portion of the work area. A total of 0.15acre of the work area is within non-tidal brackish marsh. The marsh habitat is characterized by patchy monocultures of spear orach (*Atriplex patula*) and seacoast bulrush (*Bolboschoenus robustus*) interspersed with cattails (*Typha latifolia*), knotweed (*Persicaria lapathifolia*), and largeseed goosefoot (*Chenopodium macrospermum*). The margins of the marsh are defined in most locations by a band of alkali heath, with pickleweed (*Salicornia pacifica*), fennel (*Foeniculum vulgare*), saltgrass, silverweed (*Potentilla anserina* ssp. *pacifica*), and Baltic rush (*Juncus balticus* ssp. *ater*) intermixed along the wetland/upland ecotone.

### **REVEGETATION PLAN**

#### Non-Native Grasslands

Prior to this plan, PG&E submitted a Biological Assessment with PG&E's MRHCP, in which Field Protocol (FP) 14 states: "if the covered activity disturbs 0.1 acre or more of habitat for a covered species in grasslands, the field crew will revegetate the area with a commercial "weed free" seed mix." The majority of the work area is in uplands which support grazed and disturbed non-native grassland. PG&E will follow FP-14 to restore the uplands consistent with its existing permit.

In an effort to improve native cover in this non-native grassland, PG&E will use a "weed free" seed mix. PG&E proposes to use the following native seed mix, incorporating native species such as *Bromus carinatus*, *Elymus glaucus*, *Vulpia microstachys*, and *Trifolium ciliolatum*. PG&E will complete pre- and post-project qualitative evaluation of cover composition in impacted uplands (Native vs. non-native) and will include uplands in post-construction monitoring and maintenance efforts to encourage establishment and improvement of native cover.

#### Non-Tidal Brackish Marsh

This revegetation plan addresses revegetation of 0.15-acre of temporary impacts to non-tidal brackish marsh impacted by construction. Revegetation of non-tidal brackish marsh will be completed onsite at a ratio of 1:1 for area of impact. The plan proposes utilization of onsite native plant stock to increase and expand cover of native vegetation in the work area, where vegetative cover is currently dominated by non-native species. If necessary, locally-obtained seed and/or container stock from nursery-grown sources will be used to supplement onsite materials.

To the extent feasible, onsite revegetation of non-tidal brackish marsh will occur through preservation of existing onsite vegetation by retaining existing, established root stock. Where replacement of excavated material is not authorized due to requirements to off-haul contaminated or hazardous soil, revegetation will be accomplished through a combination of utilization of onsite plant material as well as supplemental seeding. For locations which will be subject to ground disturbance from excavation of the pipeline, revegetation methods are described below.

# Site Preparation

Pre-project preparation will be an important element of tracking and achieving success of revegetation. Pre-project site preparation will include identifying an appropriate reference site, establishing photographic documentation stations, separating or sourcing revegetation seed and material, and establishing conditions suitable for growth of marsh habitat upon completion of construction.

# <u>Site Assessment</u>

Prior to initiation of construction activities, a site assessment will be completed by a qualified botanist or biologist to evaluate the habitats within and adjacent to the work area. The work area will be marked in the field prior to the assessment. The primary objective of the site assessment will be identification of an adjacent site or sites which supports habitat with similar vegetative cover as well as species composition to the wetlands in the project work area. The adjacent site will be utilized as a reference site for sampling to assess restoration performance, as described in Field Monitoring, below. Sampling of the work area and reference site (as described in Field

Monitoring) will be completed prior to construction to provide baseline data for vegetative cover and composition in the marsh and establish the suitability of the reference site for comparison with habitat in the work area.

The site assessment will also include establishment of photographic documentation stations which provide representative views of all marsh habitat having potential to be temporarily impacted by work activities as well as of the adjacent reference site.

#### **Revegetation Material**

Revegetation of brackish marsh in the work area will primarily be accomplished through preservation of existing vegetation. This will be completed, in part, by salvage and retention of above-ground vegetative material and associated seed of native salt marsh species to be pruned during clearing of the work area for construction. If additional plant material is required, PG&E will source native, weed-free container stock.

Utilization of pickleweed mulch has been shown to be an effective method for salt marsh restoration (Miles et al, 2015). Pickleweed and other rhizomatous species such as alkali heath and saltgrass will be collected prior to construction where it is growing in marsh habitat that will be impacted by work activities.

Vegetation in the work area to be utilized for revegetation will be pruned by hand, collected, and maintained moist prior to access by construction. If native soils may be used for backfill pursuant to the DTSC soil management plan, as topsoil is removed from the excavation area, mulch collected during vegetation removal will be blended with the topsoil to be stockpiled on-site separate from subsoils. To the extent feasible, stockpiled topsoil will be maintained moist until it is replaced at completion of construction. If imported soil must be used for backfill, mulch collected during site preparation will be maintained moist until it can be blended with imported topsoil.

# Maintenance of Existing Vegetation in Areas not to be Excavated

The most important contributing factor to revegetation of wetland habitats in the work area is expected to be preserving existing root stock so that areas naturally revegetate. Where necessary, vegetative cover in the work areas will be pruned at ground level prior to construction. Pruning will remove cover but will maintain below-ground root masses as well as seed in topsoil. Wetland species such as alkali heath, pickleweed, bulrush, and cattails are durable and readily re-sprout from root masses. If deemed necessary, soil within the work area may be lightly scarified following construction to alleviate soil compaction and encourage sprouting from conserved root masses.

Where excavation is required, to the extent allowable under the DTSC soil management plan or any other hazardous materials or applicable human safety plans, excavations will be completed in a manner which preserves topsoil with root masses of wetland species such as salt marsh bulrush, cattails, saltgrass, and pickleweed to the maximum extent feasible. As described above, topsoil will be maintained separate from subsoils and will be replaced as the final soil layer upon completion of work activities. If native topsoil cannot be used for backfill, revegetation of excavated areas will be completed principally through incorporation of salvaged mulch into imported topsoil and supplemental seeding.

#### **Restoration of Pre-Project Contours**

Following completion of pipeline repairs, soil will be returned to restore the pre-project contours of the work area. If authorized under the DTSC soil management plan, native soils removed during excavation will be used to restore pre-project contours. As possible, the upper 18 inches of excavated topsoil will be stockpiled separate from subsoils and returned back on top when work is complete. If native soil cannot be utilized for backfill, suitable PG&E-approved material will be used to backfill the excavation (pipeline engineering requires some materials for standard pipeline backfilling to ensure pipeline safety).

During restoration of the contours, topsoil (native or imported) will be returned to the surface layer of the excavation blended with salvaged mulch and root masses. To the extent allowable by pipeline safety requirements, compaction of soils replaced to the upper 18-inches of the excavation will be minimized to encourage vegetation establishment. Following restoration of pre-project contours, best management practices for erosion control including, but not limited to, fiber blankets and straw wattles will be installed to stabilize soil in the work area disturbed during construction.

#### Revegetation

Revegetation will be completed principally through salvage and retention of existing plant material, as described under site preparation.

In the event excavated soils with root masses cannot be utilized for backfill due to requirements of the DTSC soil management plan, supplemental planting material may be utilized to encourage regrowth of marsh vegetation within the locations excavated for identification of girth welds and repair of the anomaly.

Cuttings from species with rhizomatous growth habits or known to become established from vegetative cuttings, such as saltgrass, pickleweed, silverweed, and/or alkali heath will be collected from the surrounding marsh and blended with topsoil replaced in the excavation sites. Supplemental seeding may also be broadcast onto the temporarily impacted non-tidal brackish marsh within the work area. Dependent upon availability, the seed mix will include, saltgrass, pickleweed, gumplant (*Grindelia stricta*), alkali heath, and seacoast bulrush, and will be applied at a rate of approximately 45 pounds per acre. Species may be added or removed from the seed mix based on availability and suitability for the site, as determined by a qualified vegetation ecologist. Container stock or cuttings may also be used, if the vegetation ecologist determines the need for additional material. Care will be taken to ensure container stock does not contain *Phytophthora* sp.

# FIELD MONITORING

To document and evaluate revegetation performance, the following monitoring protocol will be implemented to quantify the vegetation reestablishment at locations where the work activities affect brackish marsh habitat.

# Field Monitoring

A qualified vegetation ecologist will conduct field sampling annually between May and early Fall. Field monitoring will include the collection of species or species association cover data based on line-intercept sampling and photo-documentation. In addition to this data, the vegetation ecologist will also conduct a thorough inspection of the restoration site and record general observations on vegetation establishment and biological conditions. During surveys, invasive weeds rated as "high" from the California Invasive Plant Council's Inventory Database (Cal-IPC 2017) will be identified for removal from the sites. Invasive species not previously known from the site will be noted.

#### **Sampling Protocol**

A line-intercept protocol will be used to record species cover and exposed soils. Site cover will be recorded using methods as described by the Bureau of Land Management (BLM 1998), as modified below for this Project.

Sampling transects will be established to allow for data collection which includes areas temporarily impacted by staging and access, areas subjected to ground disturbance for excavations, and in the adjacent reference site identified during site assessment. The ends of each transect will be established with rebar or t-post. The beginning and ending locations of each transect will be noted with a global positioning system (GPS) unit. Along each transect, cover by dominant species or dominant species associations will be recorded. Exposed soil, rock, or thatch will be recorded when vegetation is absent.

Where the size and/or dimension of work areas do not lend themselves to establishment of linear sampling transects, quadrat sampling will be implemented to quantify vegetative cover within the work areas comparative with adjacent undisturbed habitat.

The field investigator will identify plant species using Baldwin et al. (2012); plant nomenclature should follow the Jepson online interchange (UC Berkeley 2017).

# Photographic Documentation

Photographic documentation stations established at the time of pre-project site assessment will be repeated during field monitoring. Additional stations may be added as deemed appropriate following completion of construction activities. Color photographs will be taken from fixed points with the same view to allow a review of the revegetation progress over time. Additionally, the surveyor will photograph each transect during the annual sampling. The annual reports will include photographs with captions describing the location, date taken, photographer, and content of each photograph.

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#### **Performance Assessment**

The revegetation goals for the D-1502A ID-642G-4 Project include restoration of vegetation cover while not increasing cover of invasive, non-native vegetation during the monitoring period. The success of the revegetation efforts will be assessed based on a comparison of quantitative plant cover data collected from the work area/restoration site with data from reference transects selected in adjacent undisturbed marsh habitat. The following methods and criteria will be used to guide this assessment.

# **Performance** Criteria

The proposed revegetation prescription includes passive revegetation utilizing vegetative material incorporated into soils disturbed by excavations and maintenance of existing vegetation by conservation of rooted material in wetland areas not impacted by ground disturbing activities.

Performance criteria are defined based on data collected during annual monitoring, reporting, and corrective actions to be performed for three (3) years or until the vegetative cover within the work areas meets or exceeds 100 percent of the vegetative cover present in the reference site relative to unvegetated area, with non-native species present in the work area not representing cover greater than present in the reference site. Given the disturbed nature of the site, it is anticipated that sampling of reference sites will contain a heavy burden of non-native species ahead of planned work which will be documented ahead of project work.

No further monitoring will be required once final performance criteria are met. Tracking of performance will utilize interim performance criteria of 25 percent vegetative cover one year following completion of construction and 50 percent after two years. If criteria is met earlier than year 3, no additional monitoring will be required.

Additionally, cover of invasive weeds rated as Cal IPC "high" shall not exceed relative cover of the surrounding un-impacted areas as recorded at the reference site.

If these success criteria are not achieved at the end of three years, PG&E shall determine and report whether the site is on track to meet performance criteria or further corrective actions are necessary to restore vegetation.

As a condition for work, PG&E is required to follow a *Soil Management Plan* (SMP) prepared on behalf of Dynegy Moss Landing, LLC (DML) for portions of the Moss Landing Power Plant (MLPP), which is located in Moss Landing, California ("the Site;"). This SMP was prepared as a condition of the Land Use Covenant (LUC) executed by DML and the California Department of Toxic Substances Control (DTSC) on April 16, 2014, to address Parcels I, III, and IV.

For all work at this Project site, DML is the Site owner and is lead on any projects involving soil disturbance. DML is ultimately responsible for activities and soil management. PG&E gas line work is going to take place in what is known as Parcel III: Former Eastern Tank Farm Area where heavy metals, polycyclic aromatic hydrocarbons (PAHs), and total petroleum hydrocarbons (TPHs) are known to occur on site. Detections of TPH, volatile organic compounds, or VOCs, polychlorinated biphenyls (PCBs), pesticides, and herbicides are considered to represent impacts to soil, as these constituents are generally not present in native soil.

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PG&E is required to follow the LUC entered into by DML and the Department of Toxic Substances Control (DTSC), including requirements to off-haul soil. Given that the project work area being restored to pre-existing conditions is a former Tank Farm area from the power plant, PG&E may be required to remove contaminated soil, to an unknown depth. Removal of soils, if required to comply with the SMP, could have a detrimental effect on the availability of local seed bank for revegetation. Additionally, presence of contaminated soils unrelated to PG&E activities on the parcel where the work area is situated could have unknown consequence to the viability of revegetation of the site. PG&E will document in annual reports whether contaminated soils (possessing substances such as herbicides) could be impacting success of the onsite restoration. Should contaminated soils be determined to be a significant limiting factor for meeting success criteria for revegetation of the brackish marsh, PG&E will pursue a good faith effort to revegetate the contaminated site over the duration of the three-year monitoring period, but will not be responsible for meeting cover requirements.

#### **Remedial Actions**

Remedial actions may be required to meet the performance criteria. These measures may include, but not be limited to, supplemental planting or increased treatments for weed control. If presence of invasive weeds (rated as moderate or high on the CAL-IPC list) is identified as having potential for keeping the revegetation areas from meeting performance criteria, control methods will be implemented as deemed appropriate by a qualified vegetation ecologist. Implementation of remedial actions will occur, as appropriate, until performance criteria are met and will be based on the general recruitment trend, site-specific factors, and consideration of regional trends (i.e., drought, etc.). Consideration of remedial actions will be based on the causal factors contributing to mortality, slow growth, or poor recruitment. These considerations will be included in each annual monitoring report.

#### REPORTING

The progress of establishment of the vegetation will be reported on an annual basis. Annual reports will describe the establishment of the vegetation based on sampling described above and recommended remedial actions deemed necessary to meet the performance criteria.

Annual monitoring reports will be prepared following collection of monitoring data. PG&E will submit the annual reports on or before January 31. The first report will be due once at least a full year has past from completion of construction. For example, if construction is completed in August, 2023, Year 1 monitoring will be completed in 2024 and the first monitoring report submitted on or before January 31, 2025.

The annual monitoring report describing progress of the revegetation effort will address all methods and materials, results, problems, remedial actions implemented, and recommendations associated with the Project. Monitoring data will be summarized in table or graphical format to ensure clarity of the information presented. Annual reports will be cumulative in nature, providing a summary of results from previous years monitoring. The following annotated outline will be used for the annual report:

- 1. Monitoring Results
  - a. Methods (including modifications to the monitoring protocol)
  - b. Preconstruction Vegetation Inventory:
    - i. Vegetation data collected prior to construction, including photodocumentation, species composition and percent cover data.
  - c. Annual Transect Data
- 2. Performance Assessment
  - a. Evaluation of conditions relative to the performance criteria
- 3. Remedial Measures
  - a. Measures proposed based on current conditions
  - b. Assessment of measures identified and implemented following the previous monitoring period
- 4. Overall Site Progress
- 5. References Cited
- 6. Appendices
  - a. Photo Documentation

# ADAPTIVE MANAGEMENT

In the unanticipated event that disturbance of the restoration site is required due to additional construction on PG&E facilities, this restoration plan will be revised, as appropriate, in coordination with the new construction. If the revegetation site is impacted by fire, flood, property owner damage, vandalism, or other activities that were not a result of PG&E's actions, the affected area will be deemed complete and PG&E will have no further restoration obligations.

#### **REFERENCES CITED**

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