Mitigation Monitoring, Compliance, and Reporting Program

COMPLIANCE PLAN

Aliso Canyon Turbine Replacement Project

Version 2.2

May 2015

Prepared by Ecology and Environment, Inc. for:

State of California
Public Utilities Commission

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Acronyms and Abbreviations

Addendum	Addendum to the Final Environmental Impact Report
AECOM	AECOM Technology Corporation
APM	applicant proposed measures
AQMD	Air Quality Management District
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CM	Compliance Manager
CPUC	California Public Utilities Commission
DCM	Deputy Compliance Manager
E & E	Ecology & Environment, Inc.
EC	Environmental Coordinator
EIR	Environmental Impact Report
kV	kilovolt
MM	mitigation measure
MMCRP	Mitigation Monitoring, Compliance, and Reporting Program
NTP	Notice to Proceed
O&M	Operations and Maintenance
PFM	Petition for Modification
PM	Project Manager
project	Aliso Canyon Turbine Replacement Project
RWQCB	Regional Water Quality Control Board
SCE	Southern California Edison
scf	standard cubic feet
SoCalGas	Southern California Gas Company
SQAQMD	Southern California Air Quality Management District
storage field	Aliso Canyon Natural Gas Storage Field
USFWS	U.S. Fish and Wildlife Service

1.0 Overview and Purpose

The California Public Utilities Commission (CPUC) approved a Certificate of Public Convenience and Necessity for the Aliso Canyon Turbine Replacement Project (project) on November 14, 2013. As part of this action, the CPUC certified the Final Environmental Impact Report (EIR) for the project and adopted the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) presented in the Final EIR. In addition, the CPUC approved a Petition for Modification (PFM) for the project on December 18, 2014, which made several changes to the project description, applicant proposed measures (APMs), and mitigation measures (MMs), and analyzed these changes through an Addendum to the Final EIR (Addendum). This document, referred to here as the Compliance Plan, describes the MMCRP, which serves as a working guide to maintaining environmental compliance for the project, and includes information provided in the Final EIR and Addendum for the project, as well as specific protocols, guidelines, and standard procedures for environmental compliance to be followed prior to and during project construction.

The purpose of this Compliance Plan is to ensure effective implementation of the applicant proposed measures (APMs) and mitigation measures required by the CPUC that Southern California Gas Company (SoCalGas) and Southern California Edison (SCE) have agreed to implement as part of the project and to facilitate the monitoring, compliance, and reporting activities of the CPUC and its monitors. This Compliance Plan aims to clearly present the project's organization, establish lines of communication related to mitigation monitoring, and provide a method of effectively documenting and reporting compliance with all APMs and mitigation measures adopted by the CPUC.

This document describes the process by which environmental monitors designated by CPUC Energy Division staff (Energy Division) will observe construction of the project to ensure full implementation of each APM and mitigation measure. In all instances where an Energy Division-designated environmental monitor records "non-compliance" (i.e., evidence that SoCalGas or SCE is not fully implementing each applicable APM and mitigation measure), the monitor will issue a warning to the construction supervisor and SoCalGas's or SCE's respective Project Manager (PM). Continued non-compliance will be reported to the designated Energy Division PM. As described below, any decisions to halt work due to non-compliance will be made by a member of the Energy Division compliance team, which comprises the Energy Division PM, the Energy Division-designated Compliance Manager (CM), the Energy Division-designated Deputy Compliance Manager (DCM), and the Energy Division-designated environmental monitors. The Energy Division-designated environmental monitors will keep records of any instances of non-compliance with mitigation measures, APMs, or other conditions of project approval. Copies of these records will be provided to SoCalGas, SCE, and Energy Division staff.

Throughout the course of project construction, the protocols, guidelines, and procedures presented in this Compliance Plan may be revised as needed to address the specific, day-to-day realities of project construction. Future revisions of this Compliance Plan document will be indicated by the version number shown on the front cover and in the document header.

1.1 Regulatory Background

Under California Environmental Quality Act (CEQA) Guidelines Section 15097, the Lead Agency (in this case, the CPUC) is responsible for developing a mitigation monitoring and reporting program to ensure that all project revisions and mitigation measures described in the findings associated with approval of the project are implemented. Monitoring refers to the ongoing or periodic process by which project construction and operation are overseen by the Lead Agency; in the case of the project, monitoring will ensure that SoCalGas's and SCE's compliance with project conditions is checked on a regular basis.

Reporting, which comprises written reviews of SoCalGas's and SCE's compliance with APMs and mitigation measures presented to the decision-making body or a designated staff person, ensures that the Lead Agency is informed of SoCalGas's and SCE's compliance with APMs and mitigation measures. The CEQA Guidelines encourage cooperation in mitigation monitoring and reporting between lead and responsible agencies, where possible.

1.2 Project Overview

The construction of the project will increase SoCalGas's Aliso Canyon Natural Gas Storage Field's (storage field's) natural gas injection rate from approximately 300 million standard cubic feet (scf) per day to approximately 450 million scf per day. New and modified SCE electric service facilities will be required to provide power for the project; thus, the improvements that will be carried out by SCE are considered part of the project.

1.2.1 Construction

Components

As part of the project, and as described in the Final EIR and Addendum, SoCalGas will construct and operate the following project components at the storage field:

- Central Compressor Station, including three new electric-driven, variable-speed compressors and pipelines to connect the station to existing facilities;
- 12-kilovolt (kV) Plant Power Line to supply the Central Compressor Station with power;
- Office and crew-shift buildings; and
- Guardhouse on a widened segment of the existing entry road into the storage field.

SoCalGas will decommission and remove the:

- Existing compressor station and its three gas turbine–driven compressors; and
- Existing main office and crew-shift buildings.

To provide power to the electric-driven compressors, SCE will:

- Construct and operate a 56-megavolt-ampere, 66/12-kV substation (the Natural Substation) on the storage field site; and
- Reconductor and replace towers and poles along segments of SCE's Chatsworth–MacNeil–Newhall–San Fernando 66-kV Subtransmission Line and MacNeil–Newhall–San Fernando 66-kV Subtransmission Line in the project area.

To allow for remote monitoring and operation of the electrical facilities, SCE will:

- Install equipment at SCE's Newhall, Chatsworth, and San Fernando substations in the project area; and
- Install new fiber optic telecommunications cable in the project area.

Further details of these project components are presented in Table 1.

Table 1. Project Construction Activities (Updated May 2015)

Project Component/Construction Activities	Duration (months)	Number of Workers During Peak Period	Anticipated Start Date
Guardhouse and office/crew-shift buildings (decommissioning and construction), entry road, staging areas, access roads, Natural Substation site preparation	22	50	***March 2014***
Central Compressor Station and 12-kV plant power line construction, installation of pipelines, Natural Substation construction, start of 66-kV subtransmission line construction (Phase 1)	20	227	***September 2014***
Remaining 66-kV subtransmission line construction (Phases 2 and 3), decommissioning of old 66-kV subtransmission line	11	40	***October 2014***
Fiber optic cable and telecommunications equipment installation	14	10-15	***February 2015***
Decommissioning of existing compressor station	4	20	***Late 2017***
Total	**36**	**232 workers (peak)**	

For a complete description of the project, see Chapter 2, Project Description, of the Final EIR (July 22, 2013) and the PFM (December 18, 2014).

The APMs and mitigation measures that apply to these project components are listed in Table 5, provided in Section 4 of this document. In general, the APMs and mitigation measures are applicable to all project components; however, certain mitigation measures are component-specific.

1.2.2 Notice to Proceed

Prior to beginning construction of the project components, SoCalGas and SCE are required to prepare and obtain approvals for requests for Notices to Proceed (NTPs). The Energy Division will not authorize construction activities until all relevant preconstruction requirements are completed as appropriate for the relevant stage of the project. Before granting approval of an NTP, the Energy Division will confirm that the applicant and/or SCE has complied with all preconstruction APMs and mitigation measures, including any required surveys, and has obtained all appropriate approvals from other regulatory agencies. Construction may not start on any project component or stage before SoCalGas and/or SCE receives a written NTP from the Energy Division PM. The Energy Division PM may issue NTPs for construction of each component or phase of the project separately as preconstruction compliance is satisfactorily accomplished for that component or phase, dependent on SoCalGas's and SCE's construction plans and schedules.

The NTP will document that relevant preconstruction requirements, including any required surveys and permit requirements, have been met. More than one NTP will be submitted for the project, and the construction activities to be completed as part of each NTP have been determined by the applicant based on the construction schedule, the anticipated schedule for permit approvals, and other considerations.

Each NTP may include CPUC or other agency conditions or requirements that must be satisfied prior to the start of work or during construction. Construction is defined as any mobilization activity that would move construction-related equipment and/or materials onto a site.

An NTP request must include the following:

- Description of the work to be performed, including a brief comparison of the proposed work and the project component as described in the Final EIR or Addendum;

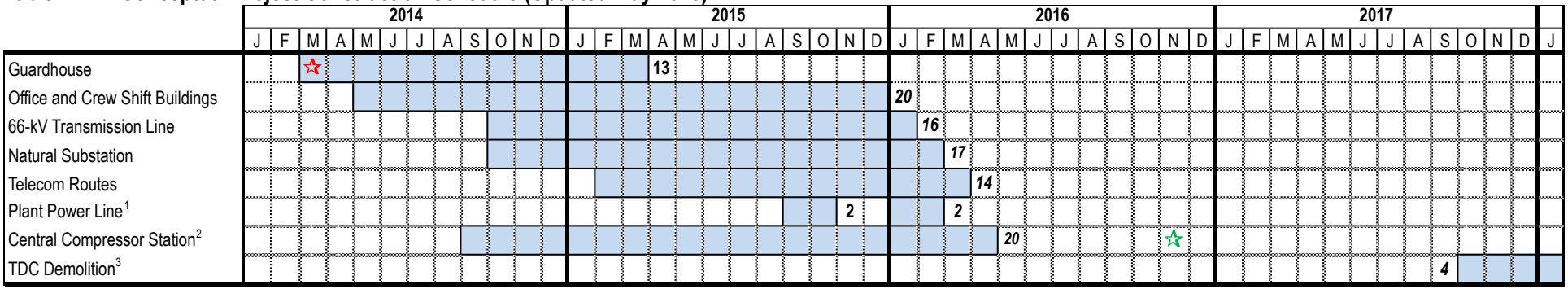
- Description of all ancillary activities required for the project component or components (for example, electrical, plumbing, excavation, paving, landscaping, or site restoration);
- Identification of any staging areas that would be used during construction;
- Detailed description of the location of the project component or components covered in the NTP, including maps, photographs, and other supporting documents;
- Estimate of area of total new land disturbance associated with project component or components;
- Date of expected construction and duration of work;
- Anticipated number of construction workers, including total workers and peak number;
- Anticipated equipment required for construction;
- Verification that all relevant preconstruction APMs and mitigation measures have been completed or implemented;
- Verification that all applicable jurisdictional permits or agency approvals have been obtained for the work covered by the NTP request (if required);
- If some preconstruction compliance items cannot be completed prior to issuance of the NTP, an identification and description of the outstanding submittals, as well as how they will be completed and approved in a timely manner prior to construction; and
- Up-to-date biological resource surveys or a commitment to survey and submit results prior to construction.

In conjunction with the Energy Division Compliance Manager (CM), Energy Division staff will review each NTP request in accordance with the steps outlined below:

1. SoCalGas and/or SCE submits an NTP request;
2. The Energy Division PM or CM will distribute the NTP request to the appropriate resource specialists and reviewers to determine the completeness of the request, as applicable;
3. The Energy Division PM and/or CM will also review the NTP and, if needed, prepare a list of outstanding requirements, identifying where additional information or clarification is needed;
4. The Energy Division PM or CM will submit any questions and comments, including requests for required additional information or clarification, to SoCalGas and/or SCE via email;
5. As needed, SoCalGas and/or SCE will submit clarifications and/or additional information to be added to the NTP request in a memo, email, or letter format, along with responses addressing all comments and questions forwarded by the Energy Division PM and/or CM;
6. The Energy Division PM and/or CM will update the Project Implementation Tracker tool documenting compliance and any outstanding requirements that need to be made conditions of the NTP. If comments or conditions are provided by permitting agencies, these will also be considered for incorporation into the NTP approval letter and compliance table;
7. The Energy Division CM will prepare the draft NTP approval letter, which will document the scope of work, compliance with all requirements, and list outstanding conditions; and
8. The Energy Division PM will review and approve the NTP approval letter and send the approval to SoCalGas and/or SCE.

Construction commenced February, 2014 and is anticipated to take approximately 30 to 36 months to complete, including time for inspection, testing, and decommissioning. SoCalGas's targeted operation startup date is November 30, 2016. A conceptual project construction phasing schedule is provided in Table 2.

Table 2. Conceptual Project Construction Schedule (Updated May 2015)



1. Two phase installation: TSPs installed first, and pull conductors and terminate at Natural Substation and Central Compressor Station second.
2. Central Compressor Station construction completed as indicated followed by 6 months of minor or non-construction activities such as performance testing, commissioning, and punch-list completion.
3. Turbine-driven compressors (existing plant) demolition scheduled for four months duration and scheduled to occur approximately 12 months following Central Compressor Station in-service date.

☆ Construction start

☆ Central Compressor Station in-service date

1.2.3 Project Compliance Requirements

Per the adopted APMs and mitigation measures, SoCalGas and SCE are required to prepare and submit plans, reports, and other documentation to the CPUC or other agencies. Some measures require that plans or other documentation be prepared in consultation with other agencies. The Energy Division monitoring team, including the Energy Division PM, CM, and technical experts, will review all plans and other documentation as they are submitted by SoCalGas or SCE. Each required submittal will be approved once the Energy Division determines that it complies with the relevant APM or mitigation measure. The timing for each submittal is described in Table 5. The Energy Division will not authorize the start of construction until all relevant requirements are fulfilled as appropriate for a given phase.

Table 3 presents a summary of many of the plans, reports, and other documentation required (not including surveys), along with the APM or mitigation measure associated with each requirement, and the agencies responsible for reviewing each requirement.

Table 3. Aliso Canyon Turbine Replacement Project: Plans, Reports, and Other Documentation Required for Compliance Verification

Item	MM or APM	Responsible Action Agency
Construction equipment's certified tier specification, BACT documentation, and/or CARB or SCAQMD operating permit	MM AQ-1	CPUC
Air Quality Documentation: 1. NO_x Reduction Measures 2. Mitigation Agreement for Purchase of NO_x Credits 3. Monthly Report on NO_x Emissions	MM AQ-2, MM AQ-3	CPUC, AQMD
Biologist, archeologist, and paleontologist qualifications	APM BR-1a, MM CR-1, MM CR-6	CPUC
Restoration Plan for Reconductoring Activities	APM BR-3	CPUC
WEAP Training; Paleontology sensitivity training	MM CR-7	CPUC
Habitat Restoration Plan for Venturan Coastal Sage Scrub	MM BR-3	CPUC
Jurisdictional delineation	N/A	CPUC, USACE, CDFW, RWQCB
Lake and Streambed Alteration Agreement (Section 1600 permit)	MM BR-5	CPUC, CDFW
Section 401 permit	MM BR-5	CPUC, RWQCB
Section 404 permit	MM BR-5	CPUC, USACE
Proposed measures for compliance with APLIC	MM BR-6	CPUC
Avian Protection Plan	MM BR-7	CPUC, USFWS, CDFW
Nesting Bird Management Plan	MM BR-8	CPUC, USFWS, CDFW
Oak Tree Replacement Plan	MM BR-15	CPUC, City of Santa Clarita, Los Angeles and Ventura Counties
Restoration Plan for Plummer's Mariposa Lily and Slender Mariposa Lily	MM BR-12	CPUC, CDFW
Record of unanticipated archeological or paleontological discovery	MM CR-4, MM CR-9	CPUC

Table 3. Aliso Canyon Turbine Replacement Project: Plans, Reports, and Other Documentation Required for Compliance Verification

Item	MM or APM	Responsible Action Agency
Archeological and paleontological monitoring and treatment plans	MM CR-1, MM CR-6	CPUC
Notification and report of discovery of human remains	MM CR-3	CPUC, County Coroner
Stormwater Pollution Prevention Plans	APM GE-2	CPUC, SWRCB
Spill Prevention Measures	APM HZ-3	CPUC
Materials Safety Data Sheets	APM HZ-5	CPUC
Contaminated Soils Contingency Plan	MM HZ-1	CPUC
Record of FAA Consultation	MM HZ-1	CPUC, FAA
Construction Fire Control and Emergency Response Measures	MM HZ-2	CPUC, City of Los Angeles Fire Department, Los Angeles County and Ventura County Fire Departments
Record of coordination with fire departments	MM HZ-3	CPUC, City of Los Angeles Fire Department, Los Angeles County and Ventura County Fire Departments
Construction Noise Control Plan	MM NS-2	CPUC
Notification of Construction (Noise)	MM NS-3	CPUC
Helicopter Use Notification	MM NS-2	CPUC
Operational Noise Control Survey Report and Measures	MM NS-3	CPUC
Traffic Control Plan; record of coordination with City of Santa Clarita traffic engineer	MM TT-1	CPUC, City of Santa Clarita
Record of Repair of Damaged Roads	APM TT-2	CPUC
Commuter Plan	APM TT-3	CPUC

Key:
APLIC = Avian Power Line Interaction Committee
APM = Applicant Proposed Measures
AQMD = South Coast Air Quality Management District
BACT = Best Available Control Practices
CARB = California Air Resources Board
CDFW = California Department of Fish and Wildlife
CPUC = California Public Utilities Commission
FAA = Federal Aviation Administration
MM = Mitigation Measure
NO_x = oxides of nitrogen
RWQCB = Los Angeles Regional Water Quality Control Board
SWRCB = State Water Resources Control Board
USACE = U.S. Army Corps of Engineers
WEAP = Worker Environmental Awareness Program

1.3 Agency Jurisdiction

In addition to the CPUC, local, state, and federal agencies have jurisdiction over lands and resources in the project area. As Lead Agency, the CPUC is responsible for ensuring that mitigation measures that are reviewed and approved by other agencies during the environmental review process are implemented throughout the construction period. Staff from other agencies (e.g., California Department of Fish and Wildlife [CDFW], U.S. Fish and Wildlife Service [USFWS], Regional Water Quality Control Boards [RWQCBs], and Air Quality Management Districts [AQMDs]) may periodically visit the site or request information regarding the status of mitigation implementation. SoCalGas and SCE are responsible for

contacting agencies and immediately notifying them of compliance issues within their jurisdictions, and will also notify and/or copy the Energy Division on all correspondence related to permits and approvals for the project, ensuring that any documentation sent to a non-CPUC agency in response to requirements in an APM or mitigation measure is also sent to the Energy Division PM and CM. If an issue regarding compliance with an APM, mitigation measure, or permit requirement under the jurisdiction of an agency remains unresolved, the Energy Division PM, CM, or monitors may elect to contact the agency directly to discuss resolution.

2.0 Roles and Responsibilities

This section outlines roles and responsibilities specific to the Compliance Plan. Figure 1 provides an organizational chart of Energy Division, SoCalGas, and SCE team members responsible for implementing the Compliance Plan and their relationship to other staff working on the project. The organization chart also establishes proposed paths of communication between team members and through a clear chain of command.

2.1 Organization Overview

SoCalGas, as the project applicant, has the primary responsibility to ensure compliance with its aspects of the Compliance Plan and any other relevant local, state, or federal regulations or authorizations. SCE is a participating entity in project implementation, and is responsible for environmental compliance with project components that SCE agreed to implement as part of the project. SCE filed an advice letter pursuant to General Order 131-D for separate authorization by the Commission for construction of its project components, and SoCalGas will coordinate directly with SCE to confirm overall compliance on all project components at all times during construction. Notwithstanding, if SCE or its agents do not undertake the required mitigation, the Commission may ultimately hold SoCalGas responsible for mitigating the impacts caused by the project.

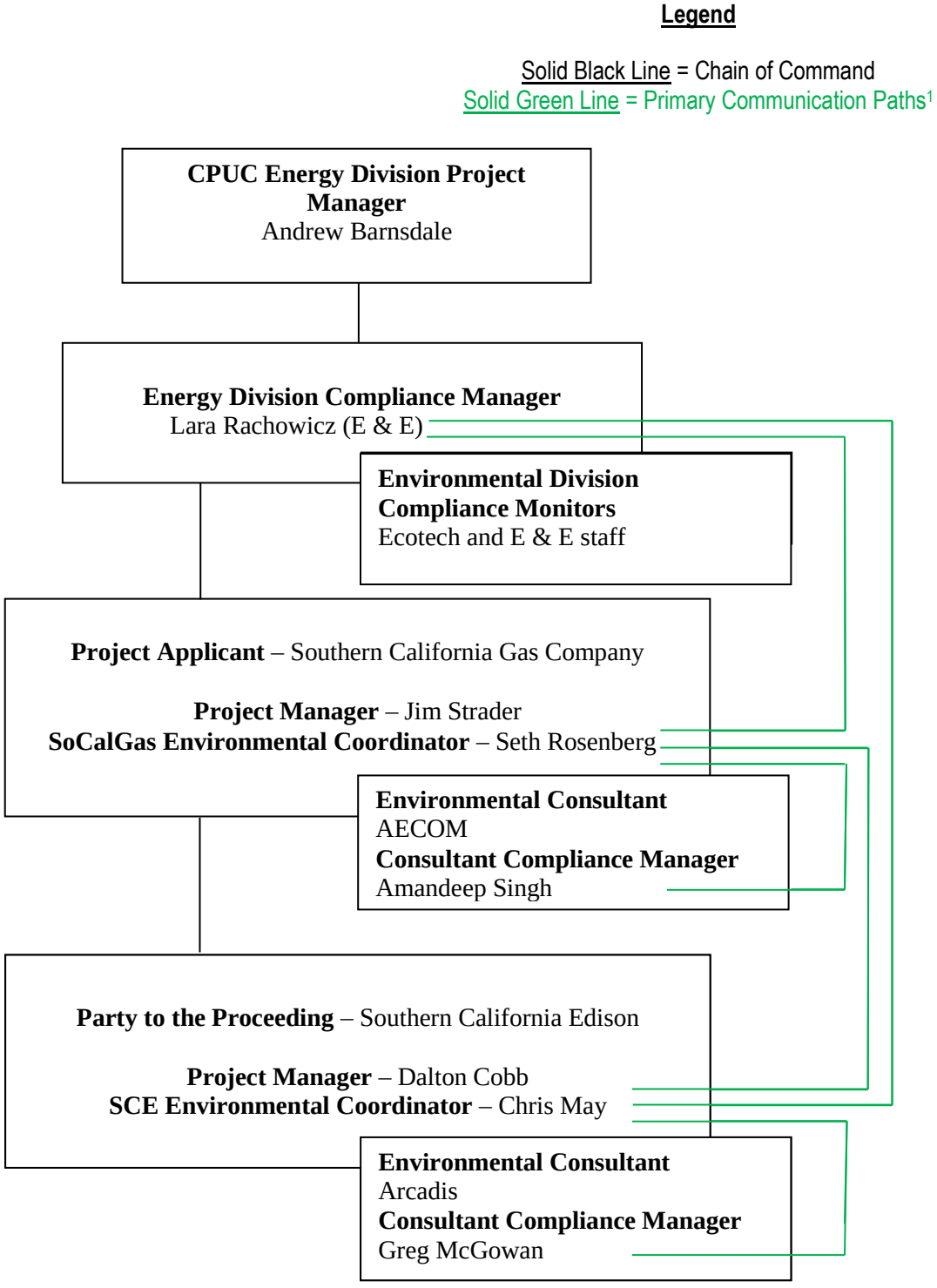
For the discussion in this section, the following acronyms will be used:

PM: Project Manager (applies to SoCalGas, SCE, and Energy Division)
EC: Environmental Coordinator (applies to SoCalGas and SCE)
CM: Compliance Manager (applies to SoCalGas, SCE, and Energy Division)

2.1.1 SoCalGas Project Manager

Role and Responsibility. SoCalGas's PM, Mr. James Strader, is part of SoCalGas's Major Projects Department and will provide the overall direction, management, leadership, and corporate coordination for the project. Mr. Strader is responsible for the project construction schedule and for ensuring that the project is completed as required by project contract documents and conditions, including adopted APMs, mitigation measures, and agency permitting requirements. Mr. Strader will lead environmental compliance throughout the duration of construction for the SoCalGas project components, and will work with the SCE PM (described below) to also ensure compliance for SCE project components.

Figure 1. Organizational Chart



[1] This chart depicts primary communication pathways only and **does not preclude** communication among various Energy Division or project proponent field staff (e.g., Compliance Monitors, Environmental Consultants, and Construction Leads/Managers) and/or all Environmental Managers.

The SoCalGas PM's responsibilities include, but are not limited to:

- Leading coordination among engineering, construction management, and environmental staff for both SoCalGas and SCE;
- Leading coordination between SoCalGas staff (and SCE staff as needed) and regulatory agencies to ensure that all agency requirements are met;
- Leading the integration of environmental responsibilities into all levels of project construction activities;
- Ensuring compliance with project APMs and mitigation measures, as well as any other project environmental policies, guidelines, and procedures;
- Ensuring that data, including work schedule, location, and critical issue information, are provided to members of the project construction team as needed; and
- Communicating project activities, schedules, and environmental and public relations issues to the project team as needed.

Reporting Relationship. The SoCalGas PM reports to upper management within SoCalGas' Major Projects Department. The SoCalGas PM gives direction to the SoCalGas Environmental Coordinator (EC), whose role is described below.

Communication. The SoCalGas PM communicates with the SoCalGas EC and construction management team.

2.1.2 SoCalGas Environmental Coordinator

Role and Responsibility. SoCalGas's Environmental Coordinator (EC), Mr. Seth Rosenberg, is responsible for providing the appropriate level of resources for successful environmental compliance. The SoCalGas EC communicates with staff at the resource agencies, who, in turn, also communicate with the Energy Division PM and CM. The EC is responsible for directing development and implementation of preconstruction environmental planning, permitting, and compliance activities; the environmental inspection and preconstruction survey program; and the Worker Environmental Awareness Training Program. The EC is also responsible for ensuring compliance with requirements in project permits, APMs, and mitigation measures. Mr. Rosenberg will be assisted by SoCalGas's environmental consultant, AECOM Technology Corporation (AECOM), and AECOM's CM, Amandeep Singh. The SoCalGas EC is ultimately responsible for ensuring that both SoCalGas and SCE construction crews maintain compliance with all project permits, APMs, and mitigation measures. The SoCalGas' EC is the primary compliance POC for SoCalGas.

Reporting Relationship. The SoCalGas EC reports to the SoCalGas PM and directs the work of SoCalGas subject matter experts and the AECOM CM.

Communication. The SoCalGas EC communicates with the resource agencies, all members of the project environmental compliance monitoring team, and the SoCalGas PM. The SoCalGas EC also oversees all communication with SoCalGas contractors and team members.

2.1.3 SCE Project Manager

The SCE PM, Mr. Dalton Cobb, will fulfill a role similar to that of the SoCalGas PM but will oversee construction and compliance for SCE's project components. The SCE PM will coordinate with the

SoCalGas PM on a regular basis to ensure compliance with APMs, mitigation measures, and project policies, guidelines, and procedures.

2.1.4 SCE Environmental Coordinator

SCE's EC, Ms. Chris May, will fulfill a role similar to that of the SoCalGas EC, but will be responsible for overseeing environmental compliance on SCE's project components. Ms. May will be assisted by SCE's environmental consultant, Arcadis. The SCE EC communicates with staff at the resource agencies, who, in turn, also communicate with the Energy Division PM and CM. The SCE EC will be assisted by Arcadis's CM, Greg McGowan. The SCE EC, along with the SCE Regulatory Policy & Affairs Representative (Christine McLeod) who is the SCE POC for the Energy Division PM, are the primary compliance POCs for SCE.

2.1.5 SoCalGas and SCE Environmental Monitoring Team

SoCalGas's and SCE's environmental monitors are the primary field staff responsible for evaluating, documenting, and verifying that construction activities comply with all applicable requirements. The environmental monitoring teams for SoCalGas and SCE will each be led by the respective utility's environmental consultant's CM under the direct supervision of each utility's EC. The CMs will coordinate the activities of their respective environmental monitoring teams, including biological, paleontological, and archaeological monitors (i.e., Specialty Monitors), to comply with each APM and mitigation measure. Each environmental monitor will work closely with construction personnel to ensure that preconstruction surveys are completed and APMs and mitigation measures are effectively implemented. The SoCalGas and SCE environmental monitors will also work closely with the Energy Division Compliance Monitors to determine whether adjustments to construction procedures are needed to provide adequate protection of sensitive resources. Specialty Monitors will be assigned by SoCalGas and SCE as needed and as required to protect sensitive biological, paleontological, and archaeological resources.

The SoCalGas and SCE Environmental Monitoring teams will work together on a continuous basis to ensure project activities for both utilities comply with all applicable requirements. Compliance communication will flow between the SoCalGas and SCE ECs and will focus on reporting requirements, consistent interpretations of implementing conditions and processes, and monitoring requirements.

The teams will meet weekly once construction begins at either the project construction trailers or other appropriate locations. These meetings will at a minimum include the SoCalGas and SCE ECs and their respective environmental consultant's CM. The meetings will provide a forum for the environmental consultant's CM to report directly to each utility's EC any issues representing non-compliance or the potential to result in non-compliance. Additional Subject Matter Experts (SMEs), PMs, and environmental monitors may be invited to the meetings on an as-needed basis, and meeting frequency may be reduced to a bi-weekly (every two weeks) schedule if all participants agree. In the event of any non-compliance issues or construction activities that have the potential to result in non-compliance, SoCalGas and SCE ECs will communicate with each other on a daily basis in addition to communicating with the Energy Division CM, and, as needed, PM, on these matters.

In addition to ensuring compliance during construction, SoCalGas and SCE are required to provide updates to the Energy Division CM and PM. These updates will consist of Weekly Status Updates, which will include construction schedules for the upcoming week and monthly Environmental Compliance Reports providing a summary of the past month's construction activities and any applicable environmental issues. Each utility's environmental consultant CM will provide drafts of the status updates to their respective ECs who will review and approve the status updates before being submitted to the Energy Division CM and PM.

In order to expedite reporting requirements, both utilities will provide status updates jointly. SCE will provide status updates and MMCRP reporting requirements to SoCalGas, who will consolidate with their own reporting. The SCE EC will submit the status updates to the SoCalGas EC, who in turn will submit them to the Energy Division CM.

2.1.6 Energy Division Project Manager

The Energy Division PM, Mr. Andrew Barnsdale, will determine the effectiveness of compliance with environmental requirements based on the success criteria included for each APM and mitigation measure. Mr. Barnsdale will assign monitoring and reporting responsibilities to a third-party contractor (Ecology & Environment, Inc. [E & E]) as described below, and will oversee the work of the third-party contractor through review of monthly status reports. Mr. Barnsdale will be notified of non-compliance situations and may be involved in the resolution of the issue(s). All requests for Minor Project Refinements and NTPs will be submitted to Mr. Barnsdale for review and approval.

2.1.7 Energy Division Compliance Manager and Monitors

The Energy Division's third-party contractor, E & E, will report to the Energy Division PM. E & E's assigned Compliance Manager (Energy Division CM) is Ms. Lara Rachowicz who will be the designated point of contact. The Energy Division CM will report to the Energy Division PM. E & E's assigned Deputy Compliance Manager (Energy Division DCM) is Ms. Claire Hodgkins, who will assist the CM in all project areas. The Energy Division CM and/or DCM will consult with the Energy Division PM to determine the appropriate level of inspection frequency, and will also oversee one or more Compliance Monitors, the on-the-ground personnel responsible for observing and reporting compliance with the terms and conditions of the CPUC Certificate of Public Convenience and Necessity. The number of Compliance Monitors and frequency of site inspections will depend on the number of concurrent construction activities and their locations. The Energy Division CM and DCM are an integral part of the project team and will stay apprised of construction activities, schedule changes, and construction progress. The Energy Division CM, DCM, and Compliance Monitors will document compliance through daily site inspection forms, the use of a table tracking APMs and mitigation measures, and monthly reports to the Energy Division PM.

2.1.8 Construction Supervisor

Construction supervisors will be identified for both SoCalGas and SCE prior to the start of construction. The construction supervisors will provide daily construction work schedules to on-site construction personnel and monitors and will describe the nature and extent of scheduled construction activities to ensure that adequate monitoring resources are provided. The construction supervisors will also ensure that construction schedules are provided to SoCalGas and SCE ECs so they in turn can provide those on a timely basis to the Energy Division PM and CM (i.e., weekly on Friday afternoon). The construction supervisors will also report any deviations from compliance and spills (e.g., fuel or water) to the SoCalGas and SCE Compliance Monitors.

Key environmental responsibilities for the construction supervisors include, but are not limited to:

- In conjunction with the ECs, verifying that all construction workers attend the project environmental training program prior to beginning work;
- Reviewing and understanding the environmental requirements; and

- In conjunction with the ECs, implementing environmental protection requirements and conditions during construction and maintaining compliance with project requirements, including adopted APMs and mitigation measures.

2.1.9 Mitigation Monitoring Program Contact List

A project contact list is included as Attachment A. The contact list includes email, telephone, and physical business address information for the SoCalGas, SCE, and Energy Division monitors, PMs, supervisory staff, and other members of the project team, and their roles. The contact list will be updated periodically as needed and redistributed to the project team.

2.2 Mitigation Compliance

SoCalGas and SCE are responsible for successfully implementing all adopted APMs and mitigation measures and shall inform the Energy Division PM in writing of any APMs or mitigation measures that may not be feasible or cannot be successfully implemented. The Energy Division PM, in coordination with the Energy Division CM, will assess whether alternative action is appropriate and specify to SoCalGas and SCE any required subsequent actions.

The Energy Division is responsible for tracking and monitoring compliance with APMs and mitigation measures through the Energy Division Compliance Monitors operating under the supervision of the Energy Division CM. The Energy Division Compliance Monitors will record compliance issues, notify designated project members, and report any problems to the Energy Division CM and/or Energy Division PM. The Energy Division has the authority to halt any construction activity associated with the project if the activity is determined to be a serious deviation from the approved project or adopted APMs and mitigation measures. A stop-work order would follow the communication procedure outlined in Section 2.3.1.

The Energy Division monitors compliance with the project APMs and mitigation measures; seeks to ensure that they are effective and implementable; and gathers information, documents, and reports related to such compliance. The Energy Division does not conduct enforcement actions related to non-compliance with APMs and/or mitigation measures. The CPUC Safety and Enforcement Division (SED) investigates and conducts enforcement actions related to non-compliance with APMs, mitigation measures, and/or Commission Orders or Decisions.

Any enforcement actions related to non-compliance with APMs or mitigation measures would be taken by SED pursuant to the process created by the Commission in Resolution E-4550 (May 9, 2013).[2] Per Resolution E-4550, CPUC may impose fines in the event the applicant does not comply with mitigation measures. CPUC staff will determine whether a fine is appropriate for non-compliance events consistent with Resolution E-4550. Examples of non-compliances that may result in fines being issued by CPUC staff include but are not limited to the following:

- Continuing construction after an authorized staff person has required construction to stop;
- Starting construction components that have not been approved through a Notice to Proceed;
- Violating nest buffer zones;
- Encroachment into an exclusion zone or sensitive resource area designated for avoidance;

[2] http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M065/K136/65136746.PDF

- Grading, foundation, line work, or other ground disturbance without required biological pre-construction surveys or biological monitor on site;
- Use of new access roads, overland travel routes, staging areas, or extra work spaces that have not been approved;
- Failure to properly maintain an erosion or sediment control structure;
- Working outside of approved work hours; and
- Project Personnel working without training.

2.2.1 Monitoring

As the Lead Agency under CEQA, the CPUC is required to monitor the project to ensure that the APMs and mitigation measures are implemented. The Energy Division has primary responsibility for ensuring full compliance with the provisions of the monitoring program. The Compliance Monitors, under the supervision of the Energy Division CM, will monitor construction activities in the project areas on a regular basis, particularly when construction activities have the potential to impact a sensitive resource.

SoCalGas and SCE may elect to have one or more full-time environmental monitors on site on a daily basis to coordinate specialty monitors (such as biologists and archeologists), assist construction crews with interpreting APMs and mitigation measures, and help correct compliance problems in a timely manner. Environmental monitors will also provide environmental training through the Worker Environmental Awareness Training Program. Several APMs and mitigation measures require SoCalGas and/or SCE to supply a Specialty Monitor with specific qualifications. These monitors and the related APMs and mitigation measures are identified in Table 4.

Table 4. Specialty Monitors Required during Construction

Specialty Monitor	Related APM or MM
Biologist: general	APM BR-1, APM BR-1b, APM BR-1c, APM BR-1d, APM BR-2, APM BR-5, APM BR-6
Biologist: gnatcatcher specialist	APM BR-4, BR-1, MM BR-2, MM BR-3
Biologist: least Bell's vireo specialist	MM BR-9
Biologist: golden eagle specialist	MM BR-10
Arborist	MM BR-15, MM BR-14
Botanist	MM BR-12, MM BR-14
Archeologist	MM CR-4, MM CR-5, APM CR-2, MM CR-1, APM CR-4, MM CR-2, MM CR-3
Paleontologist	MM CR-6, MM CR-7, MM CR-8, MM CR-9

2.2.2 Preconstruction Survey Protocols

Preconstruction biological, archaeological/cultural, and paleontological surveys are required where appropriate according to the adopted APMs and mitigation measures. This section describes SoCalGas's and/or SCE's approach in conducting these required surveys and any additional clearance sweeps.

SoCalGas's and SCE's approach to conducting the preconstruction surveys are guided by the project's individual resource treatment plans and will be implemented with the intent of fulfilling the intention of the applicable measures from the MMCRP. Preconstruction biological surveys can include a wide range of scopes and schedules. For example, some surveys were required prior to construction but are largely

based on seasonal nesting or blooming periods. These include the Nesting Bird Management Plan, Oak Tree Impact Report, Special Status Plant Survey, Golden Eagle Survey, Venturan Coastal Sage Scrub Habitat Surveys, and the Focused Coastal California Gnatcatcher Surveys.

Additional surveys are required within a specific time frame based on the onset of construction. The preconstruction surveys required by APM BR-1a and APM BR-1c in the MMCRP are conducted to identify sensitive biological resources in the project component areas, including access roads and staging areas within the month prior to construction. In addition, during this time invasive plants are identified for the Non-Native and Invasive Plant Species Survey.

Lastly, some preconstruction surveys may be required as clearance sweeps the day before or any day of construction. These would include project components where sensitive resources have been identified by any previous surveys in the vicinity of construction activity. The duration and spatial extent to which clearance surveys need to be conducted will be at the discretion of the lead SoCalGas or SCE (consulting) biologist, and after consultation with appropriate resource agencies where applicable.

Other treatment plans require additional preconstruction surveys. These include surveys as described in the Archaeological Monitoring and Treatment Plan and the Paleontological Monitoring and Treatment Plan. These surveys have been previously conducted in order to produce the treatment plans, to identify any special conditions or preconstruction mitigation that may be required.

The results of each survey will be included in either the individual component preconstruction survey report or the first monthly Environmental Compliance Reports, depending on the timing of the survey. Information gathered from the preconstruction surveys will be forwarded to both the Environmental Division CM and PM for review and concurrence that the surveys were adequate and support the intent of the applicable measures from the MMCRP. In addition, the results of the surveys will be shared at either preconstruction kick-off meetings or routine tailgate meetings with the construction contractors to ensure they know what areas, if any, to avoid or ask for clarification from the environmental monitors.

2.3 Communication

Communication is a critical component of a successful environmental compliance program. To avoid project delays and possible work stoppages, Energy Division, SoCalGas, and SCE environmental and construction representatives will interact regularly, maintain professional, responsive communications at all times, and coordinate closely to address and resolve issues in a timely manner. This section presents a communication protocol to accurately and efficiently disseminate information regarding ongoing surveys, APMs, mitigation measures, construction activities, construction contractor oversight, and planned or upcoming work prior to the commencement of construction. These communication protocols may be refined and revised for future versions of this Compliance Plan as needed, to address the specific day-to-day realities of project construction.

2.3.1 Construction Progress Meetings, Conference Calls, and Construction Halts

Construction Kick-off Meetings. A construction kick-off meeting will be held prior to the start of construction to review the Compliance Plan, set expectations concerning the implementation of APMs and mitigation measures, and mutually agree on communication and reporting protocols. Representatives of SoCalGas, SCE, and Energy Division management and environmental compliance teams must be present. Representatives from SoCalGas's and SCE's construction contractors should also be present to provide input on construction methods and schedule. Additional meetings may be held prior to the start of major work phases (i.e., following each NTP issued by the Energy Division PM).

Status Update Conference Calls. Conference calls may be held on a regular basis (i.e., weekly, monthly, or twice-monthly), or on an as-needed basis throughout construction. The need for conference calls, whether regular or as-needed, should be determined in the early stages of construction. Participants should generally include the Energy Division PM, SoCalGas and SCE PMs; the Energy Division CM and DCM; SoCalGas and SCE ECs; Energy Division Compliance Monitors, and representatives from SCE and/or SoCalGas who are knowledgeable about project engineering and schedule. Specialty monitors, technical experts, and/or construction contractors will be invited as needed. Call timing and participants may vary according to the topics discussed. Topics discussed on status update conference calls will include overall project schedule, weekly construction schedules, pertinent environmental compliance issues, any anticipated minor project refinements, and any relevant compliance patterns and trends.

Construction Halts. Several scenarios may occur during project construction for which the Energy Division team may need to communicate immediately with field staff to halt construction activity:

- A **temporary hold** would be a short-term (i.e., less than eight hours) cessation of construction activities that could be called by Energy Division Compliance Monitors. This hold would be used in circumstances where minor clarification of a mitigation measure or resolution of a minor issue by the field compliance crews is necessary to ensure environmental compliance, or where a serious environmental infraction would occur without immediate intervention. Energy Division Compliance Monitors would consult with the Energy Division PM or CM in the case of a temporary hold, and are authorized to end the hold with clear communication to the SoCalGas and SCE field coordinators, if the monitor confirms that environmental compliance will be achieved. Depending on the issue, a temporary hold could transition to a stop-work order (below).
- In the event that a serious non-compliance or safety issue occurs (e.g., take of a listed species; repeated, high-level non-compliance incidents concerning the same resource; or serious worker injury), the Energy Division may elect to issue a **stop-work order**. The stop-work order would be issued in writing by the Energy Division PM, and may require work to stop on all or portions of the project, or on certain construction activities, for a specifically stated time period as determined by the Energy Division PM on a case-by-case basis. The stop-work order would also include a timeline for resolution of the situation and any potential recommendations from the Energy Division compliance team. Resolution of the compliance issue would be communicated in writing by SoCalGas and SCE to the Energy Division PM, who would then issue an end to the stop-work order in writing. The applicant would be required to implement any temporary hold or stop-work order in a responsible manner to avoid hazards to public health and safety, as well as to environmental resources. Certain activities cannot be safely halted mid-course, and all work areas must be first safely secured for protection of humans and wildlife prior to complete cessation of work. Additionally, as appropriate, the applicant should address any serious safety issues by calling 911 immediately.
- Either the Energy Division PM or CM, or SoCalGas or SCE, may initiate a construction **stand-down** to discuss resolution of a non-compliance or safety issue. A stand-down differs from a stop-work order in that the issue at hand would not immediately result in serious consequences, but requires an overall re-alignment of protocols or practices to ensure continued compliance or safety. The stand-down could require work to stop on all, or a portion of, the project for up to one full day, or until a process and schedule for resolution can be determined by Energy Division staff and SoCalGas and SCE. The purpose of the stand-down would be to give SoCalGas and SCE the opportunity to re-train construction personnel, confer with management staff to achieve resolution, and/or discuss an issue with the Energy Division CM or PM. As indicated, a stand-down can be a voluntary action by SoCalGas or SCE, and should be issued in writing (email is acceptable) with clear timelines and recommendations outlined. Resolutions resulting from a

stand-down should be submitted in writing to the Energy Division PM. A stand-down called by SoCalGas or SCE does not require approval by the CPUC to re-start work. Stand-downs should be implemented only after all other attempts at resolution have proven unsuccessful.

These procedures are discussed further under section 3.1.4.

2.3.2 Daily Communication

Many issues that arise during construction can be resolved in the field through regular communication among the Energy Division Compliance Monitors, SoCalGas or SCE environmental monitors, and construction superintendents (supervisors). All field staff will be equipped with cell phones or two-way radios (or immediate access to a cell phone or radio) and should be available to receive calls at all times during construction. Offsite staff will be available during normal business hours via email or phone. If field-based staff change regularly (e.g., if lead monitors are on duty only one or two days per week), the use of a single point of contact is highly recommended (e.g., a single cell phone should be assigned to whichever lead monitor is on duty each day) to facilitate communication continuity. Changes to key staff will be reported to the Energy Division PM and CM as soon as possible, and the project contact list updated accordingly.

The main point of contact for Energy Division Compliance Monitors in the field is SoCalGas's EC or SCE's EC, as applicable to the construction activity. An Energy Division Compliance Monitor will contact the SoCalGas EC and/or SCE's EC if any activity is observed that conflicts with one or more of the APMs or mitigation measures to correct the issue (see Section 3.1.4 for a description of communication protocols). The Energy Division Compliance Monitor will also contact the SoCalGas EC and/or SCE's EC for construction locations, the status of APM or mitigation measure implementation, and schedule forecasts. Much of this information can be obtained through participation in tailboard meetings prior to the start of construction each day. The Energy Division Compliance Monitor may discuss construction procedures directly with the construction supervisor, but such discussions should be limited to basic questions pertaining to clarification of daily project activities and mitigation measure compliance. All other questions between contractors and Energy Division Compliance Monitors, especially those concerning construction means and methods, should be directed to the SoCalGas EC and/or SCE's EC. The Energy Division Compliance Monitor will not provide work direction to the contractor or SoCalGas's and SCE's environmental monitors, and will avoid directing questions to the construction crews.

2.3.3 SoCalGas's Environmental Compliance Report

As discussed in Section 2.1.5, SoCalGas will provide a joint SoCalGas and SCE Weekly Status Update to the Energy Division CM and PM, which will include construction schedules for the upcoming week. Each utility's environmental consultant CM will provide drafts of the status updates to their respective ECs who will review and approve the status updates before being submitted to the Energy Division CM and PM.

In addition, SoCalGas will prepare and distribute a monthly environmental compliance report, which will consolidate reporting on both SoCalGas and SCE activities, for distribution to key project members, including the Energy Division CM and PM. The Energy Division CM will review the reports to ensure that the status of APMs and mitigation measures is consistent with observations in the field. The report will also be a tool to keep all parties informed of construction progress and compliance trends. Topics that should be covered in the report include:

- Construction status update for all active work phases and a look-ahead work description and schedule for subsequent work within each active package.
- Compliance summary detailing compliance activities such as notable survey efforts, non-compliance incidents and their resolutions, preparation for implementation of mitigation measures for future work phases, recently submitted or processed minor project refinements, a list of outstanding agency deliverables, and representative monitoring photographs. SoCalGas and SCE are required to keep accurate and detailed accounts of non-compliance incidents (and subsequent resolutions) as identified by the CPUC as well as self-reported.

2.3.4 Dispute Resolution

The following procedure will be observed for dispute resolution:

- **Step 1.** Disputes and complaints (including those of the public) should be directed first to the Energy Division PM for resolution. The Energy Division PM will attempt to resolve the dispute.
- **Step 2.** Should this informal process fail, the Energy Division PM may initiate enforcement or compliance action to address deviations from the project or adopted APMs and mitigation measures.
- **Step 3.** If a dispute or complaint regarding the implementation or evaluation of APMs or mitigation measures cannot be resolved informally or through enforcement or compliance action by the Energy Division PM, any affected participant in the dispute or complaint may file a written "notice of dispute" with the CPUC Executive Director. This notice should be filed in order to resolve the dispute in a timely manner, with copies concurrently served on other affected participants. Within 10 days of receipt, the Executive Director or designee(s) shall meet or confer with the filer and other affected participants for the purposes of resolving the dispute. The Executive Director shall issue an Executive Resolution describing his/her decision and serve it on the filer and other affected participants.
- **Step 4.** If one or more of the affected parties is not satisfied with the decision as described in the resolution, such party(ies) may appeal it to the CPUC via a procedure to be specified by the commission.

Parties may also seek review by the CPUC through existing procedures specified in the CPUC Rules of Practice and Procedure for formal and expedited dispute resolution, although a good faith effort should first be made to use the foregoing procedure.

2.3.5 Definitions

This section defines common terms pertaining to construction and compliance monitoring. These definitions are intended to set expectations for the interpretation of each term throughout the construction period.

Avian breeding season: Also known as the nesting season. The breeding or nesting season is recognized to begin when the first nest or nest start is discovered, and ends when the last nest is confirmed to be no longer in use. Generally, the avian breeding season in California is recognized as the interval from January through August (USFWS 2005).

Construction or construction activity: Any activity involving personnel, vehicles, and equipment, the purpose of which is to build, alter, or demolish, or prepare to build, alter, or demolish, a component related to the project after the first NTP is approved. Construction may or may not involve ground or

vegetation disturbance. Construction activities have the potential to negatively impact environmental resources and are subject to the requirements of the project's APMs and mitigation measures.

Exclusion area: Also referred to as buffers or exclusion zones. Any area intended to separate a sensitive resource from construction activities. Construction personnel may not enter an exclusion area, whether on foot or in a vehicle (including helicopters), without permission from the Energy Division CM, and must be escorted by a monitor. Exclusion areas may be delineated or marked by flagging, signage, stakes, rope, or natural barriers, or a combination of these. Examples of exclusion areas include buffers around bird nests, jurisdictional drainages, cultural resources, special status plants, or areas of Venturan Coastal Sage Scrub.

Fugitive dust: Any solid particulate matter that becomes airborne, other than that emitted by an exhaust stack, directly or indirectly as a result of the activities of any person (Southern California Air Quality Management District [SCAQMD Rule 403]). For the purposes of this project, fugitive dust from any active operation, open storage pile, or disturbed surface will be considered a hazard or nuisance if: (1) dust remains visible in the atmosphere beyond the property line of the emission source; or (2) the dust emission exceeds 20 percent opacity.

Ground disturbance: Modification of a land surface from its previously undisturbed and/or natural condition, thereby increasing the potential for fugitive dust emissions and risk to wildlife and plants. Examples of disturbance include excavating, grading, driving over vegetation, drilling, or mowing.

High wind conditions: A condition in which sustained wind speeds exceed 25 miles per hour, as measured by a SCAQMD-approved measurement device used to measure wind speed in accordance with the performance standards, maintenance and calibration criteria specified in the Rule 403.1 Implementation Handbook (SCAQMD Rule 403).

Operations & maintenance: Also referred to as O&M activities or phase or post-construction activities. The project will transition into O&M when the construction activities described in the Final EIR and NTPs, including the installation, testing, and startup or energizing of all project components, have been completed. Following completion of construction, the project will enter a post-construction phase involving the closeout of plans and permits, submittal of final reports, and the commencement of restoration activities. Importantly, activities conducted in the O&M phase are not subject to most of the APMs and mitigation measures described in the Final EIR, with the exception of several APMs and mitigation measures, including those focused on restoration.

Prewatering: Also referred to as watering or water application. Application of water during construction and earthmoving operations to excavation areas and borrow pits before earth is excavated. The areas to be excavated are moistened to the full depth from the surface to the bottom of the excavation to achieve optimum moisture content for fugitive dust control (Countess Environmental 2006).

Property Line (as pertaining to air emissions): The boundaries of an area in which either a person or entity causing the emission or a person or entity allowing the emission has the legal use or possession of the property. Where such property is divided into one or more sub-tenancies, the property line(s) shall refer to the boundaries dividing the areas of all sub-tenancies.

Trackout: Also referred to as sediment trackout. Any bulk material that adheres to and agglomerates on the exterior surface of motor vehicles, haul trucks, and equipment (including tires) that has been released onto a paved road and can be removed by a vacuum sweeper or a broom sweeper under normal operating conditions (SCAQMD Rule 403).

Wildlife disturbance: Agitation or bothering of wildlife to a degree that causes, or is likely to cause, based on the best scientific information available and as determined by a qualified biologist: (1) injury to the individual; (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or; (3) nest or den abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior. Wildlife disturbance could be considered direct or indirect:

- **Direct disturbance** is any action that could potentially kill or injure wildlife (e.g., mowing, driving, excavation).
- **Indirect disturbance** is any action that interferes with normal behavior to the extent that it leads to decreased productivity or den or nest abandonment (e.g., dust, noise, human presence).

Work area: Also referred to as construction area, access area, or staging area. An area defined as the boundaries within which construction is or will be occurring, and where activities may directly impact wildlife. A work area is active if humans are consistently present in the area, with no lengthy lulls in activity (i.e., lulls of more than two weeks).

3.0 Mitigation Measures Compliance and Reporting

3.1 Compliance Verification and Monitoring

The Energy Division Compliance Monitors will conduct routine site visits at a reasonable frequency (generally once per week) to determine the project's compliance with the mitigation measures. Site visits will be coordinated with SoCalGas and/or SCE. During each site visit, Energy Division Compliance Monitors will document observations within the project work areas through field notes and photographs. Monitors will fill out a site inspection form (Attachment B) to document the compliance of specific crews, construction activities, or protection measures. This form acts as a standardized checklist to facilitate inspections and record APMs and mitigation measures that were checked during visits.

The Energy Division CM will use these reports and supplemental information provided by SoCalGas and/or SCE, including preconstruction plan submittals, survey result reports, compliance reports, meeting notes, and agency correspondence to verify compliance. This information will be compiled into a monthly report that E & E will submit to the Energy Division PM.

3.1.1 Non-compliance Incident

Any construction activity that deviates from permit conditions or mitigation measures, particularly when the activity puts a sensitive resource at risk, would be considered a non-compliance incident. In addition, an APM or mitigation measure not implemented according to the timing listed in the MMCRP table (Table 5 in this document) would be considered a non-compliance incident. Examples of non-compliance include, but are not limited to, the following:

- Use of new access roads, staging areas, or extra work spaces not identified on the project drawings or approved for use during construction;
- Encroachment into an exclusion zone or sensitive resource area designated for avoidance;
- Brush clearing outside the approved work limits;
- Grading, foundation, or line work without required biological preconstruction surveys or a biological monitor on site;

- Improper installation of erosion or sediment control structures if it puts a sensitive resource at risk; and
- Discharge of sediment-laden trench or foundation hole water into a water body or storm drain.

3.1.2 Non-Compliance Levels

The following descriptions indicate levels used by the Energy Division in judging the severity of non-compliance incidents.

Minor Compliance Incident: A minor compliance incident is an action that only slightly or partially deviates from project requirements and does not put a resource at risk, such as a the one-time use of an unapproved, preexisting access road or failure to properly maintain an erosion or sediment control structure, but the structure remains functional. Repeated minor compliance incidents resulting from the same action or individual may result in elevating the non-compliance level.

Non-compliance Level 1: (Clarification/Correction Required) A Level 1 compliance incident is an action that deviates from project requirements and may cause minor, temporary, or indirect damage to environmental resources. Examples include failing to properly maintain erosion control structures, resulting in minor runoff, or brush clearing outside approved work limits with no impacts to sensitive resources.

Non-compliance Level 2: (Minor Non-Compliance Incident) A Level 2 compliance incident is an action that deviates from project requirements and may cause direct, temporary impacts to environmental resources. Examples include construction activities occurring within an exclusion zone with direct impacts to sensitive species or significant cultural resources that can be rectified or halted before causing permanent damage. A non-compliance Level 2 may be issued when Level 1 incidents are repeated.

Non-compliance Level 3: (Major Non-Compliance Incident) A Level 3 compliance incident includes actions that deviate from project requirements and has the potential to cause substantial, permanent damage to environmental resources or violate local, state, or federal law. Examples include irreparable damage to archaeological sites, destruction of active bird nests, and grading of unapproved vegetated areas. A non-compliance Level 3 may also be issued if Level 2 incidents are repeated. Level 3 compliance incidents may result in a full or partial project shutdown following a stop-work order from the Energy Division PM.

3.1.3 Non-compliance Reporting

If SoCalGas or SCE discovers a non-compliance incident of any magnitude, they must notify the Energy Division CM of the incident (self-report). Non-compliance incidents may also be discovered by the Energy Division Compliance Monitor, CM, or DCM and brought to the attention of SoCalGas or SCE. For both self-reports and discoveries, the Energy Division CM may ask SoCalGas or SCE to submit an e-mail or a formal non-compliance incident report (Attachment C), either of which must include a description of the incident and corrective actions taken or proposed. Upon receipt of the non-compliance incident e-mail or formal report, the Energy Division CM and/or PM will assign the incident a level, if necessary, and determine next steps for reporting and follow-up. SoCalGas and SCE must track all non-compliance incidents and include them in their monthly reports. Reporting procedures are further detailed below (see Section 3.1.4).

3.1.4 Energy Division Compliance Team Incident Communication Process

The incident communication process is described below.

- A non-compliance may be discovered by the Energy Division CM (off-site) or observed by the Energy Division Compliance Monitor (onsite) during a site visit.
    - If the issue puts sensitive resources or human health and safety at risk and a stop-work order is warranted, the Energy Division CM will contact the Energy Division PM, SoCalGas EC and/or SCE EC immediately, as described further below. If the non-compliance does not require immediate resolution, the incident will be discussed in a phone call or email to the SoCalGas or SCE EC or on the weekly conference call.
    - If the incident is minor and can be easily resolved in the field by providing clarification to construction crews, or if it requires immediate action to prevent an easily avoidable but serious environmental impact, or if time is needed to investigate a compliance incident further, the Energy Division Compliance Monitor will notify the Energy Division CM, who may authorize a temporary hold. The temporary hold will be verbally conveyed by the Energy Division Compliance Monitor to the SoCalGas/SCE ECs to halt construction in a safe manner (see Section 2.3.1).
    - Once the issue is resolved and after the Energy Division Compliance Monitor consults with the Energy Division PM or CM, the Compliance Monitor will verbally authorize the lift of the hold to SoCalGas/SCE's ECs. If the issue is not fully resolved and may require further action or management discussions, the Energy Division CM will recommend the Energy Division PM issue a stop-work order or stand-down.
    - If onsite SoCalGas/SCE environmental monitors/ECs are unaware of the issue or are aware of an issue but do not within a reasonable time period to resolve it, the Energy Division Compliance Monitor may record the non-compliance in their daily report. Level 1 incidents are "issued" in the site inspection form itself. Level 2 or 3 incidents require consultation with the Energy Division CM and are issued in separate formal reports to SoCalGas and SCE.
- If an incident is self-reported by SoCalGas or SCE, the same procedure listed above (see Section 3.1.3) should be followed, depending on the incident's severity. SoCalGas or SCE should contact the Energy Division CM immediately for serious incidents, and report minor compliance incidents via e-mail and possibly a phone call. The Energy Division CM or DCM will send an email notification to the SoCalGas/SCE EC to ensure tracking of the incident. The Energy Division will typically not issue a non-compliance notice for a minor or level 1 self-reported incident.
- Following the initial discovery or report, the Energy Division CM may request photographs, a written incident description, and other relevant information from SoCalGas and/or SCE staff concerning the cause and potential resolution of the issue. The CM will direct SoCalGas or SCE to submit the information via email or through a formal non-compliance report, according to the incident severity. The Energy Division CM and/or PM may issue a follow-up non-compliance report from the CPUC for the same incident.
- All non-compliance incidents must be described and tracked in the utility's monthly report, and will be noted in E & E's monthly report to the Energy Division PM. For serious non-compliance incidents, the Energy Division PM may issue a stop-work order as described in Section 2.3.1. Work will be suspended within the affected area until a resolution can be planned and the Energy Division PM authorizes the resumption of construction activities in writing.
- A stand-down may be issued by the Energy Division PM, CM, DCM, SoCalGas, or SCE, as described in Section 2.3.1. Work will be halted temporarily to discuss a current compliance concern and/or re-align compliance activities as appropriate.

- Issues that are not resolved within the length of time agreed upon by SoCalGas and/or SCE and the Energy Division CM will be subject to further non-compliance notices and potential stop-work orders.
- Serious or emergency compliance incidents that occur on the weekend or after normal business hours (i.e., 8am to 5pm) will be addressed by staff identified as emergency contacts on the Project Contact List (Attachment A).

3.2 Minor Project Refinements

3.2.1 Minor Project Refinements Request Process

Requests for Energy Division PM/CM approval of a refinement must be made in writing and should include the following:

- A detailed description of the proposed refinement(s), including an explanation of why the refinements are necessary;
- Identification of the APMs, mitigation measures, project parameter, or other project stipulation for which the refinements are being requested, and citations for the approved documents;
- Photographs, maps, and other supporting documentation illustrating the difference between the existing conditions in the project area, the approved project, and the proposed refinements;
- The potential impacts of the proposed refinements, including a discussion of each environmental issue area that could be affected by the refinements with accompanying verification that there would be no increase in significant impacts on resources affected by the project and no new significant impacts, after application of previously adopted APM(s) and/or mitigation measure(s);
- Whether the refinements conflict with any APMs or mitigation measures;
- Whether the refinements conflict with any applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy; and
- The date of expected construction at the refinements site area.

The Energy Division PM or CM may request additional information, agency consultations, or a site visit in order to process the request. A minor project refinement request form is included as Attachment D.

3.2.2 Requirements for Staff Approval of Minor Refinements

To be approved by the Energy Division PM/CM, refinements must meet all of the following fixed standards. Refinements must be generally minor in scope and must ***not***:

- Be outside the geographic boundary of the study area utilized in the CEQA document;
- Create a new significant impact or a substantial increase in the severity of a previously identified significant impact, based on the thresholds used in the environmental document;
- Trigger less-restrictive or new discretionary permit requirements;[3]

[3] For example: related to water discharge, dredging, a Clean Water Act Section 404 permit or a California Fish and Game Code Section 1602 Lake or Streambed Alteration Agreement.

- Conflict with any APMs or mitigation measures or any applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy; or,
- Require new conditions for approval, without which the refinements would result in a new significant impact or a substantial increase in the severity of a previously identified significant impact.

Examples of refinements that may be approved by the Energy Division PM after final engineering include, but are not limited to:

- Adding a temporary extra work area. The additional work area must be located in a previously disturbed area with no sensitive resources or sensitive land uses adjacent to the proposed area, and must not create any new significant impacts or a substantial increase in the severity of a previously identified significant impact.
- Adjusting the alignment of a project component within the study area that was defined in the original environmental analysis to avoid sensitive resources or effects on homeowners, or adapt to conditions on the ground that vary from the conditions that existed at the time of the original environmental analysis, so long as the adjustment does not create a new significant impact or a substantial increase in the severity of a previously identified significant impact.
- Finalizing the engineering design for a project component that was not specifically described in the Final EIR or Addendum, or which requires adjustments in order to facilitate construction. The finalized design must not create a new significant impact or a substantial increase in the severity of a previously identified significant impact.

3.3 Records Management and Public Access to Records

All required documentation from SoCalGas and SCE, including plans, permits, reports, and staff qualifications as required by APMs and mitigation measures, will be maintained by SoCalGas and SCE on an internal website or database. Through the Energy Division's public website for the project, members of the public may request copies of records and reports used to track the monitoring program and the Energy Division PM or CM will send copies of publicly available records and reports to members of the public as requested. The Energy Division CM, DCM, and other members of the E & E team will compile all required documentation submitted by SoCalGas or SCE into the project's Administrative Record during construction and will confirm that the record is complete after completion of all activities required by the adopted APMs and mitigation measures. The Energy Division CM will also use this documentation to create a final environmental compliance report or presentation for the Energy Division PM that will discuss APM and mitigation measure implementation and success, with the goal of identifying lessons learned that can be applied to future projects.

4.0 Mitigation Monitoring Program Table

Table 5 presents the APMs and mitigation measures and incorporates all changes to the project, APMs, and mitigation measures that were made as a result of public review of the Draft EIR and an Addendum to the Final EIR, dated October 2014.

A copy of the table should be kept with each crew working on the project, and all supervisory staff working on the project should be familiar with its contents. Energy Division staff will use a modified version of the MMCRP table to accurately track the status of APMs and mitigation measures.

4.1 Effectiveness Review

The Energy Division may conduct a comprehensive review of conditions that are not effectively mitigating impacts at any time it deems appropriate, including as a result of the Dispute Resolution procedure outlined in Section 2.3.4. If the Energy Division determines that, based on the review, any conditions are not adequately mitigating significant environmental impacts caused by the project, the Energy Division may impose additional reasonable conditions to effectively mitigate these impacts. These reviews will be conducted in a manner consistent with the CPUC's rules and practices.

5.0 Reference List

APLIC (The Edison Electric Institute's Avian Power Line Interaction Committee) and USFWS (U. S. Fish and Wildlife Service). 2005. Avian Protection Plan (APP) Guidelines. April.

Countess Environmental. 2006. Western Regional Air Partnership (WRAP) Fugitive Dust Handbook. Prepared for Western Governors' Association. September 7.

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Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [a] and Consultation	Timing	Responsible Party and Project Component/s
4.1 Aesthetics				
Impact AE-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area	**APM AE-1: Night Lighting.** The applicant and SCE will ensure that construction activities occurring at night will use lighting to protect the safety of the construction workers but orient the lights to minimize their effect on any nearby sensitive receptors. The lighting will be directed downward and shielded to eliminate offsite light spill at times when the lighting might be in use.	CPUC monitor: Line item in monthly report	During construction (nighttime)	Applicant, SCE, and CPUC * Applicable to all project components during nighttime construction
4.2 Agriculture				
No applicable APMs or mitigation measures.				
4.3 Air Quality				
Impact AQ-3: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment.	**APM AQ-1: Maintain Engines in Good Working Condition.** The applicant and SCE will ensure that equipment engines will be maintained in good condition and in proper tune as per the manufacturers' specifications.	CPUC monitor: Line item in monthly report	During construction	Applicant, SCE, and CPUC * Applicable to all project components
	APM AQ-2: Minimization of Equipment Use. The applicant and SCE will ensure that staff and daily construction activities will be efficiently scheduled to minimize the use of unnecessary/duplicate equipment when possible.	CPUC monitor: Line item in monthly report	During construction	Applicant, SCE, and CPUC * Applicable to all project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [a] and Consultation	Timing	Responsible Party and Project Component/s
	APM AQ-3 Minimization of Disturbed Areas. The applicant and SCE will ensure that the amount of area disturbed by clearing, grading, earth-moving, or excavation operations is minimized to reduce the amount of fugitive dust that is generated during construction in a manner that meets or exceeds the requirements of the South Coast Air Quality Management District's Rule 403 (Fugitive Dust Regulations).	CPUC monitor: Line item in monthly report	During construction	Applicant, SCE, and CPUC * Applicable to all project components
	APM AQ-4: Watering Prior to Grading and Excavation. The applicant and SCE will ensure that pre-grading/excavation activities will include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water (preferably reclaimed, if available) will penetrate sufficiently to minimize fugitive dust during grading activities.	CPUC monitor: Line item in monthly report	During construction	Applicant, SCE, and CPUC * Applicable to all project components
	APM AQ-5: Vehicle Speed Limits. The applicant will post signs in the storage field along designated travel routes limiting traffic to 15 miles per hour or less on unpaved roads.	a. Map showing locations of signs posted b. CPUC monitor: Line item in monthly report	a. Prior to construction b. During construction	Applicant and CPUC * Applicable to storage field project components
	APM AQ-6: Fugitive Dust from High Winds. During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), the applicant and SCE will ensure that all clearing, grading, earth moving, and excavation operations during project construction will be curtailed to the degree necessary to prevent fugitive dust created by onsite activities and operations from being a nuisance or hazard, either offsite or onsite.	CPUC monitor: Line item in monthly report	During construction	Applicant, SCE, and CPUC * Applicable to all project components
	APM AQ-7: Cleaning of Paved Roads. The applicant will ensure that paved road surfaces will use vacuum sweeping and/or water flushing to remove buildup of loose material to control dust emissions from travel on paved access roads (including adjacent public streets impacted by construction activities) and paved parking areas.	CPUC monitor: Line item in monthly report	During construction	Applicant, SCE, and CPUC * Applicable to all project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	MM AQ-1: Construction Emission Reduction Measures. The applicant and SCE will implement the following emission reduction measures for all construction activities: 1. Ensure that all off-road diesel-powered construction equipment with engines greater than 50 horsepower (hp) are compliant with Tier 3 off-road emissions standards where available. In the event equipment with a Tier 3 engine is not available for any off-road engine larger than 50 hp, that engine shall be operated with tailpipe retrofit controls that reduce exhaust emissions of NO_x and PM to no more than Tier 3 emission levels. 2. Equipment with an engine not compliant with the Tier 3 standard will be allowed on a case-by-case basis only when the applicant or SCE has documented that no Tier 3 equipment (or emissions equivalent retrofit equipment) is available for a particular equipment type. Each case shall be documented with signed written correspondence by the appropriate construction contractor, along with documented correspondence from at least two construction equipment rental firms representing a good faith effort to locate engines that meet Tier 3 requirements. Documentation will be submitted to CPUC staff for review before equipment is used on the project. 3. Make available to CPUC staff and/or construction monitors a copy of each piece of construction equipment's certified tier specification, BACT documentation, and/or CARB or SCAQMD operating permit, as applicable, at the time of mobilization of each applicable unit of equipment. 4. Prior to start of Central Compressor Station mechanical and electrical construction activities, provide to the CPUC a weekly construction schedule that indicates whether Scenario 5 would occur. If Scenario 5 occurs on any given day, provide an equipment usage and emissions log that demonstrates the SCAQMD daily threshold for ROG was not exceeded.	a. Listing of proposed construction equipment, including details such as equipment type, age, hp, certified tier specification, emissions control devices/BACT, and CARB/SCAQMD operating permit b. For each piece of equipment not compliant with Tier 3 standard, documentation that no Tier 3 equipment is available for a particular equipment type c. CPUC monitor: Line item in monthly report	a. Prior to and during construction b. Prior to construction c. Prior to and during construction	Applicant, SCE, and CPUC * Applicable to all project components
	MM AQ-2: Measures to Reduce NO_x Emissions. Prior to construction, the applicant and SCE will submit proposed	a. Proposed measures to reduce daily emissions of	a. Prior to construction (30	Applicant, SCE, and CPUC

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	additional measures to reduce daily emissions of NO_x to CPUC staff for review and approval. Measures may include the following: 1. The use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export) or the use of trucks that meet EPA 2007 model year NO_x emissions requirements if 2010 model year or newer diesel trucks cannot be obtained. 2. A requirement that, during project construction, all construction equipment will be outfitted with BACT devices certified by CARB and that achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. 3. Other measures as determined appropriate by the applicant and SCE in consultation with the SCAQMD. As applicable, the applicant and SCE will calculate estimated emissions of NO_x that would still exceed the SCAQMD daily threshold after implementation of MM AQ-2 and will submit these calculations to CPUC staff for review prior to construction.	NO_x; documentation confirming level to which measures would reduce daily NO_x emissions b. Monthly reporting (Monitoring Plan) on actual construction NO_x emissions and implementation of measures to reduce emissions (unless Mitigation Agreement addresses all NO_x exceedances) c. CPUC monitor: Line item in monthly report	days) b. During construction (monthly) c. Prior to and during construction	* Applicable to all project components
	MM AQ-3: Mitigation Agreement for Purchase of Oxides of Nitrogen (NO_x) Credits. Unless the applicant and SCE can demonstrate through the implementation of on-site emission reduction measures (MMs AQ-1 and AQ-2) that project emissions of NO_x would not exceed the SCAQMD daily emission threshold, the entire amount of emissions of NO_x due to construction of the proposed project over this threshold will be mitigated through the offset of every pound of NO_x emissions in excess of the SCAQMD daily significance threshold of 100 pounds per day. The offset of NO_x emissions will be accomplished through the purchase of either Regional Clean Air Incentive Market Trading Credits (RTCs), Mobile Source Emission Reduction Credits (MSERCs), or a combination of RTCs and MSERCs. The total amount of NO_x RTCs and/or MSERCs to be purchased will be calculated when the construction schedule and operating conditions are finalized. The applicant and SCE will prepare a	a. Documentation confirming that Mitigation Agreement to reduce NO_x to less-than-significant levels has been reviewed and approved by the SCAQMD. b. Same as item 2. in MM AQ-2 (monthly reporting on NO_x emissions/monitoring plan) c. CPUC monitor: Line item in monthly report	a. Prior to construction (30 days) b. During construction (monthly) c. During construction	Applicant, SCE, and CPUC * Applicable to all project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	Mitigation Agreement that outlines the proposed purchase of the required RTCs and/or MSERCs. The Mitigation Agreement will be submitted to CPUC staff and SCAQMD prior to the start of project construction. The SCAQMD may require that the Mitigation Agreement be presented before and reviewed by the SCAQMD Governing Board. The Mitigation Agreement and associated credits will meet the following criteria: a. The applicant and/or SCE must demonstrate that the emission credits were derived from emission reduction project(s) through existing SCAQMD protocols. b. The credits will be current for the time the project takes place (i.e., the RTCs and/or MSERCs must not expire before or during the time period when the emissions from the project would occur). c. The applicant and SCE will retire the entire amount of NO_x emission credits needed to mitigate the exceedance of the construction significance threshold for NO_x emissions prior to commencement of project construction. All emission credits used to mitigate significant air quality impacts from construction of the proposed project will adhere to the SCAQMD's CEQA policies and procedures document titled *Revised CEQA Policy and Procedures in Allowing the Use of Emissions Credits to Mitigate Significant Air Quality Impacts from Construction*, including procedures for addressing a situation in which NO_x emissions exceed the original estimation, recordkeeping and reporting, and other procedures. The applicant will also track actual daily emissions during construction according to a monitoring plan that includes records of equipment and vehicle usage, and submit the results of this tracking to CPUC staff on a monthly basis.			

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [a] and Consultation	Timing	Responsible Party and Project Component/s
4.4 Biological Resources				
Impact BR-1: Substantial adverse direct or indirect effect on special status species.	***Coastal California Gnatcatcher Habitat (Including Critical Habitat)***			
	APM AQ-3: Minimization of Disturbed Areas. See above.			
	APM AQ-4: Watering Prior to Grading and Excavation. See above.			
	APM BR-1a: Preconstruction Surveys. Prior to construction and activities that may include vegetation clearing, staging and stockpiling, or other activities with the potential to directly or indirectly affect wildlife, the applicant and SCE will ensure that preconstruction surveys are conducted by qualified biologists for sensitive biological resources, including special-status wildlife and special-status plant species, in the project component areas, including access roads and staging areas.	a. Biologist (including botanist) qualifications b. Notification of planned surveys c. Survey report, including maps of vegetation communities in the project area (including all native vegetation, riparian vegetation, and vegetation that provides potential habitat for coastal California gnatcatcher) d. CPUC monitor: Line item in monthly report	a. At least one week prior to conducting surveys b. At least one week prior to surveys and per survey windows timing c. Within three weeks after surveys are completed and at least two weeks prior to construction d. During construction	Applicant, SCE, and CPUC * Applicable to all project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	APM BR-1b: Exclusionary Fencing to Protect Special-Status Wildlife and Plants. In the event that special-status wildlife and special-status plants are identified within a proposed project component area or vicinity (survey buffer), buffers will be established by temporary flagging or fencing (this distance may be greater depending on the species and construction activity, as determined by the biologist) between the identified resource and construction activities. Flagging and fencing will be performed or supervised by a qualified biologist to ensure that these activities are conducted without harm to sensitive species, or habitat flagging and fencing will be performed or supervised by a qualified biologist to ensure that these activities are conducted without harm to sensitive species or habitat. The information gathered from these surveys will be used to determine project planning and minimize impacts on sensitive resources from project-related activities. In addition, the results of these surveys will be used to determine the extent to which environmental specialist construction monitors will be required.	a. Biologist qualifications b. Maps showing the proposed fencing areas c. CPUC monitor: Line item in monthly report	a. At least one week prior to fencing activities b. At least 3 days prior to construction activities that would take place near the fenced area c. During construction	Applicant, SCE, and CPUC * Applicable to all project components
	APM BR-1c: Nesting Bird Surveys. For nesting birds, a field survey will be conducted by a qualified biologist to determine if active nests of bird species protected by the Migratory Bird Treaty Act and/or the California Fish and Game Code are present in the construction zone or within a minimum of 100 feet (500 feet for raptors) of the construction zone. In the event of the identification of nesting birds within a proposed project component area or vicinity, a minimum 50-foot exclusionary buffer will be established by temporary flagging or fencing (this distance may be greater depending on the bird species and construction activity, as determined by the biologist) between the nest site and construction activities. Clearing and construction within the fenced area will be postponed or halted (except for vehicle traffic on existing roads), at the discretion of the biological monitor, until the nest is vacated and juveniles have fledged.	a. Biologist qualifications b. Notification of planned surveys c. Survey report d. Maps showing the proposed flagging or fencing areas e. CPUC monitor: Line item in monthly report	a. At least one week prior to conducting surveys b. At least one week prior to surveys and per survey windows timing c. Within three weeks after surveys are completed and at least two weeks prior to construction d. At least 3 days	Applicant, SCE, CPUC, CDFW, USFWS * Applicable to all project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [a] and Consultation	Timing	Responsible Party and Project Component/s
			prior to construction activities that would take place near the fenced area and/or as stipulated in Nesting Bird Management Plans (see MM BR-8) e. During construction	
	APM BR-1d: Construction Monitoring. The biologist shall serve as a construction monitor during those periods when construction activities occur near active nest areas to ensure that no inadvertent impacts on these nests will occur. Biological monitoring will be conducted during construction work in areas in close proximity to native habitat to assure project compliance with all APMs and Mitigation Measures.	a. Biologist qualifications b. Brief report of monitoring activities c. CPUC monitor: Line item in monthly report	a. At least one week prior to construction b. As stipulated in Nesting Bird Management Plans (see MM BR-8) or by CPUC monitor c. During construction	Applicant, SCE, CPUC, CDFW, USFWS * Applicable to all project components
	APM BR-2: Designated Work Zones and Sensitive Resource Avoidance. Prior to ground-disturbing activities, the applicant and SCE will ensure that work zones are clearly staked and flagged. Construction work areas will be identified to ensure that construction activities, equipment, and associated activities are confined to designated work zones and areas supporting sensitive resources (special-status plants and wildlife, and high-value habitats, such as wetlands) are avoided.	a. Qualifications of biologist identifying areas supporting sensitive resources b. Maps showing the proposed staked and flagged areas c. CPUC monitor: Line item in monthly report	a. At least one week prior to staking and flagging activities b. At least one week prior to construction activities that would take place near the areas	Applicant, SCE, and CPUC * Applicable to all project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
			supporting sensitive resources c. Prior to and during construction	
	APM BR-3: Post-Construction Restoration for Reconductoring. SCE will ensure that all areas that are temporarily disturbed during 66-kV subtransmission line reconductoring will be restored as close to preconstruction conditions as possible or to the conditions agreed upon between the landowner and SCE following completion of construction of the proposed project.	a. Restoration plan b. Maps and photos of pre-construction conditions along 66-kV subtransmission line route c. Report of restoration activities d. CPUC monitor: Line item in monthly report	a. At least 3 months prior to construction b. 30 days prior to construction c. Within one month after completion of restoration activities d. After construction	Applicant, SCE, and CPUC * Applicable to 66-kV subtransmission line project component
	APM BR-4: Preconstruction Gnatcatcher Surveys. The applicant and SCE will ensure that protocol-level pre-construction surveys will be conducted for coastal California gnatcatcher, in project component areas where suitable habitat exists in accordance with the U.S. Fish and Wildlife Service Coastal California Gnatcatcher (Polioptila californica californica) Presence/Absence Survey Guidelines, February 28, 1997 (protocol). In the event that coastal California gnatcatcher are observed in pre-construction surveys, a qualified biologist must identify the boundaries of the pair's territory and the applicant and SCE must not conduct construction activities within 500 feet of the territory. If infeasible to maintain a buffer of 500 feet from an active gnatcatcher territory, construction activities within or near these areas will be performed outside of the breeding and nesting season (coastal California gnatcatcher breeding/ nesting season is approximately February 15 through August 30), or the applicant must consult with USFWS to determine alternative actions. Areas of 2 or more contiguous acres of suitable coastal California	a. Biologist qualifications b. Notification of planned surveys c. Survey report, including maps of areas of 2 or more contiguous acres of suitable coastal California gnatcatcher habitat d. Maps showing the proposed flagging or fencing areas e. Brief report of monitoring activities f. CPUC monitor: Line item in monthly report	a. At least one week prior to conducting surveys b. At least one week prior to surveys and per survey windows timing c. Within three weeks after surveys are completed and at least two weeks prior to construction d. At least 3 days prior to	Applicant, SCE, CPUC, CDFW, USFWS * Applicable to all project components (in areas of suitable habitat)

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	gnatcatcher habitat will be identified at the time of pre-construction surveys. The applicant and SCE may conduct construction activities in gnatcatcher habitat during the breeding and nesting season if protocol-level surveys (conducted no later than one year prior to construction activities per protocol) confirm the absence of breeding gnatcatchers, or if the 500-foot protective buffer from all active gnatcatcher territories can be maintained.		construction activities that would take place near the fenced area and/or as stipulated in Nesting Bird Management Plans (see MM BR-8) e. As stipulated in Nesting Bird Management Plans (see MM BR-8) or by CPUC monitor f. Prior to and during construction	
	APM BR-5: Exclusionary Fencing. The applicant and SCE will ensure that exclusionary fencing will be installed around work and laydown/staging areas, where necessary, to prevent inadvertent encroachment into the native habitat adjacent to areas of impact. Brightly colored, protective construction fencing and/or silt fencing will be erected surrounding the work area where it abuts native habitat prior to the start of construction and/or demolition.	a. Qualifications of biologist identifying areas of native habitat b. Maps showing the proposed fenced areas c. CPUC monitor: Line item in monthly report	a. At least one week prior to staking and flagging activities b. At least 3 days prior to construction activities that would take place near the areas supporting sensitive resources c. Prior to and during	Applicant, SCE, and CPUC * Applicable to all project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
			construction	
	APM BR-6: Biological Monitoring. The applicant and SCE will ensure that biological monitoring will be conducted during construction in all areas within 100 feet of native vegetation that has the potential, or is known, to provide habitat for special status species.	a. Biologist qualifications b. Maps of surveys of native vegetation in the project area (see APM BR-1a) c. Brief report of monitoring activities d. CPUC monitor: Line item in monthly report	a. At least one week prior to construction b. No more than 6 months prior to construction c. Monthly or as needed (as determined by CPUC biological monitor) d. During construction	Applicant, SCE, and CPUC * Applicable to all project components (all areas within 100 feet of native vegetation that provides or may provide habitat)
	APM GE-2: Erosion and Sediment Control. See below.			
	APM HZ-6: Worker Environmental Awareness Training. See below.			
	MM BR-1: Trimming of Vegetation. In order to minimize the removal of vegetation in areas of habitat for the coastal California gnatcatcher, for the 66-kV subtransmission line, Telecommunications Route #2, and proposed Natural Substation project areas, SCE will ensure that trimming of all native vegetation, riparian vegetation, and vegetation that provides potential habitat for coastal California gnatcatcher will be monitored by a qualified biologist. Trimming of native trees and native arborescent shrubs will be monitored by a qualified arborist.	a. Biologist qualifications b. Maps of surveys of vegetation communities in these project component areas (see APM BR-1a) c. Brief report of monitoring activities d. CPUC monitor: Line item in monthly report	a. At least one week prior to construction b. No more than 6 months prior to construction c. Monthly or as needed d. Prior to and during construction	SCE and CPUC * Applicable to 66-kV subtransmission line, Telecommunications Route #2, Natural Substation project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	MM BR-2: Minimize Removal of Venturan Coastal Sage Scrub. For the 66-kV subtransmission line, Telecommunications Route #2, and proposed Natural Substation project areas, SCE will minimize the removal of Venturan Coastal Sage Scrub associations, particularly within designated critical habitat for the coastal California gnatcatcher. Prior to construction and for each of these project areas, SCE will: 1. Ensure that a survey of vegetation and estimate of the total area of intact Venturan Coastal Sage Scrub is completed by a qualified botanist familiar with this vegetation association. 2. Avoid removal of more than 10 percent of intact Venturan Coastal Sage Scrub within a single project area. "Project Areas" are defined as: a. Storage field project components (including the proposed Natural Substation): areas of ground disturbance during construction; b. Access and other roads that would be constructed/modified: 300 linear feet, with a 100-foot buffer on either side of the road; and c. 66-kV line and Telecommunications Route #2: for each pole, a 100-foot radius around the base, plus 100 feet along each extent of the linear ROW beyond the 100-foot radius area. 3. Ensure that areas of intact, contiguous Venturan Coastal Sage Scrub shall not be reduced below a 2-acre threshold. In the event that SCE wishes to remove more than 10 percent of intact Venturan Coastal Sage Scrub within a single project area, or where intact, contiguous areas of Venturan Coastal Sage Scrub may be reduced below a 2-acre threshold, SCE will compensate for this loss through the restoration and/or creation of Venturan Coastal Sage Scrub habitat per SCE's Habitat Restoration Plan for Venturan Coastal Sage Scrub, at a minimum ratio of 2:1 (for example, 2 acres of Venturan Coastal Sage Scrub created or restored for every 1 acre impacted).	a. Botanist qualifications b. Maps of surveys of Venturan coastal sage scrub in these project component areas (see APM BR-1a), submitted as graphics and as GIS data. Maps will include: - Identification of discrete areas of Venturan coastal sage scrub larger than 2 acres - Layer showing designated critical habitat for the coastal California gnatcatcher - Layer showing the "project areas" as noted for each of these components - Estimates of the area of Venturan coastal sage scrub that will be removed during project construction c. Reporting of areas of Venturan coastal sage scrub removed d. CPUC monitor: Line item in monthly report	a. At least one week prior to surveys b. No more than 6 months prior to construction c. Monthly or as needed (as areas of Venturan coastal sage scrub are removed) d. Prior to and during construction	SCE CPUC * Applicable to 66-kV subtransmission line, Telecommunications Route #2, Natural Substation project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	MM BR-3: Habitat Restoration Plan for Venturan Coastal Sage Scrub. Prior to construction of the proposed project, and with the coordination and review of USFWS and CDFW, the applicant and SCE will prepare a habitat restoration plan for Venturan Coastal Sage Scrub associations for the 66-kV subtransmission line, Telecommunications Route #2, and proposed Natural Substation project areas. The restoration plan will be prepared by a qualified botanist familiar with this vegetation association. Per the requirements of MM BR-2, Venturan Coastal Sage Scrub habitat occurring in these work areas will be identified and quantified; surveys (including vegetation maps) and quantification of Venturan Coastal Sage Scrub habitat will be included in the restoration plan. Restoration will occur at a minimum ratio of 0.5:1 (0.5 acres of Venturan Coastal Sage Scrub created or restored for every 1 acre impacted during project construction), and may be completed by: 1. Establishing Venturan Coastal Sage Scrub habitat within the project areas (onsite); 2. Establishing Venturan Coastal Sage Scrub habitat outside the project areas (offsite); or 3. Purchase of credits and/or mitigation lands at a ratio above 0.5:1 from an entity reviewed and approved by the USFWS and/or CDFW. Details of the restoration plan will be finalized pending consultation between the applicant, SCE, USFWS, and CDFW. For Options 1 and 2 (establishing Venturan Coastal Sage Scrub onsite or offsite), the plan will include the following elements: planting/seeding palettes; monitoring and contingency program; monitoring schedule, including duration and performance criteria (a minimum of 80 percent successful plant establishment after a minimum of three years); and any specific measures that will be required to ensure success of the restoration effort.	a. Botanist qualifications b. Venturan coastal sage scrub restoration plan including surveys for the referenced project component areas (see MM BR-2) c. Documentation of coordination with USFWS and CDFW d. CPUC monitor: Line item in monthly report	a. Prior to submittal of the Venturan coastal sage scrub restoration plan b. At least 3 months prior to construction c. At least one month prior to construction d. Prior to, during, and after construction	SCE, CPUC, CDFW, USFWS * Applicable to 66-kV subtransmission line, Telecommunications Route #2, Natural Substation project components
	MM BR-4: Restriction of Vehicular Traffic. The applicant and SCE will ensure that, in all project construction areas, vehicular traffic (including movement of all equipment) is restricted to	a. Map showing location of signs posted (see APM AQ-5)	a. Prior to construction b. During	Applicant, SCE, CPUC * Applicable to all

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	established access roads indicated by flagging and signage. All access roads that are not otherwise assigned official speed limits will be restricted to a speed limit of a maximum of 20 miles per hour.	b. CPUC monitor: Line item in monthly report	construction	project components
	Special Status Amphibians and Reptiles			
	APM AQ-3: Minimization of Disturbed Areas. See above.			
	APMs BR-2, BR-5, and BR-6. See above.			
	APM GE-2: Erosion and Sediment Control. See above.			
	APM HZ-6: Worker Environmental Awareness Training. See below.			
	MM BR-5: Impacts on Hydrologic Features. Prior to project construction, for all proposed project components in the vicinity of hydrologic features, the applicant and SCE will: 1. Complete formal delineations per USACE protocols to confirm and determine the extent of jurisdictional wetlands present in the proposed project areas; 2. Consult with the USACE and CDFW to determine whether CWA Section 404 permits and California Department of Fish and Game Code Section 1600 Streambed Alteration Agreements are necessary for the proposed project, apply for these permits as needed, and determine the area of fill that would require compensation; 3. Commit to compensatory mitigation for any wetland fill per any required permits and in consultation with USACE and CDFW (wetland fill requiring mitigation will be compensated for at a minimum ration of 0.5:1, or 0.5 acres of wetland creation or restoration for every 1 acre of wetland fill caused by the proposed project); and 4. Ensure that biological monitors establish and maintain a minimum exclusionary buffer of 50 feet from the delineated extent of all jurisdictional wetland features during project construction. Construction of any proposed project component that requires altering, removing, or filling the bed or bank of seasonal drainages,	a. Formal delineation per USACE protocol of wetlands within the areas of all project components in the vicinity of hydrologic features b. Consultation with USACE and CDFW c. Section 404 permit (USACE) if required per consultation d. Section 1600 Streambed Alteration Agreement or letter of no effect (CDFW) e. Maps showing delineated extent of jurisdictional wetland features plus a 50-foot buffer f. Documentation of implementation of compensatory mitigation (per Section 404 permit) g. CPUC monitor: Line item	a. At least 3 months prior to construction b. Completion prior to construction c. Obtain permit prior to construction d. Obtain permit or letter prior to construction e. Prior to construction activities that would take place within the project component area shown on the map f. Within 30 days after the completion of construction	Applicant, SCE, CPUC, USACE, CDFW * Applicable to all project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	or other jurisdictional or potentially jurisdictional water feature, will be performed only when water is not present in the feature, unless otherwise allowed by the USACE and CDFW within the conditions of any respective permits and/or authorizations including the conditions of the SWPPP. If the applicant or SCE cannot maintain the 50-foot exclusionary buffer from the bed or bank of a drainage feature during project construction, the applicant or SCE will submit BMPs as outlined in the SWPPP to CPUC staff for review and approval prior to construction.	in monthly report	(and/or per the requirements of the Section 404 permit) g. Prior to and during construction	
	Special Status Birds			
	APM AQ-3: Minimization of Disturbed Areas. See above.			
	APM BR-1a through BR-6. See above.			
	APM BR-7: Wildlife Relocation and Protection. During construction activities, wildlife resources that are not considered to have special status and are determined to be in harm's way may be relocated by the applicant and SCE and/or their construction contractors to native habitat near the work area but outside the construction impact zone in order to avoid injury or mortality.	CPUC monitor: Line item in monthly report	During construction	Applicant, SCE, and CPUC * Applicable to all project components
	APM GE-2: Erosion and Sediment Control. See above.			
	APM HZ-6: Worker Environmental Awareness Training. See below.			
	APM HZ-7: Wood Pole Recycling and Disposal. See above.			
	MM BR-1 through MM BR-5. See above.			
	MM BR- 6: Avian Safe Building Standards. The applicant and SCE will design all transmission structures installed as part of the proposed project to be consistent with the Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 2006 (APLIC 2006).	a. Proposed measures for compliance with APLIC b. CPUC monitor: Line item in monthly report	a. At least 30 days prior to construction b. Prior to and during construction	Applicant, SCE, and CPUC * Applicable to 66-kV subtransmission line; Telecommunications Routes #1, #2, #3, #4; Plant Power Line; and Natural Substation

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
				project components
	MM BR-7: Avian Protection Plans. At least three months prior to construction, the applicant and SCE will develop and implement avian protection plans according to Avian Protection Plan (APP) Guidelines (APLIC & USFWS 2005). The avian protection plans will include provisions to reduce impacts on avian species during construction and operation of the proposed project, and will provide for the adaptive management of project-related issues. The Avian Protection Plans will be reviewed and approved by the CDFW and USFWS prior to construction.	a. Avian protection plans b. CPUC monitor: Line item in monthly report	a. At least 3 months prior to construction b. Prior to and during construction	Applicant, SCE, CPUC, USFWS, CDFW * Applicable to all project components
	MM BR-8: Nesting Bird Management Plans. In order to address potential conflicts between construction activities and the activities of nesting birds in the project component areas, the applicant and SCE will develop and implement Nesting Bird Management Plans in consultation with USFWS, CDFW, and CPUC staff and will submit them to CPUC staff at least three months prior to construction. The Nesting Bird Management Plans will include measures and an adaptive management program to avoid and minimize impacts to special-status and MBTA-protected bird species during nesting periods during project construction. The Nesting Bird Management Plans will include: • Guidelines for determining appropriate and effective buffer distances that will account for specific project settings, bird species, stage of nesting cycle, and construction work type; • Language specifying that the determination of appropriate and effective buffers between construction activities and identified nests will be site- and species-/guild-specific and data-driven, and not based on generalized assumptions regarding all nesting birds; • Language specifying that determinations regarding appropriate and effective buffers between construction activities and identified nests can be made in the project construction area by the CPUC staff-approved biological monitor, if that monitor is appropriately qualified per standards that will be included in the	a. Nesting Bird Management Plans b. CPUC monitor: Line item in monthly report	a. At least 3 months prior to construction b. Prior to and during construction	Applicant, SCE, CPUC, USFWS, CDFW * Applicable to all project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	Nesting Bird Management Plans. These standards will include requirements for years of experience conducting biological surveys, years of experience with specific bird species identified within the project area, and educational degree and experience.			
	MM BR-9: Pre-Construction Surveys for Least Bell's Vireo. Prior to construction, the applicant and SCE will complete protocol-level surveys for least Bell's vireo in areas of suitable or potentially suitable habitat in the proposed project component areas. Surveys will be completed by a permitted biologist(s) according to the survey protocol for least Bell's vireo (USFWS 2001). Whenever least Bell's vireo territory or nest sites are confirmed, the applicant and/or SCE will notify the USFWS and CDFW immediately upon return from the field. In the event that any least Bell's vireos or their nests are observed, biologists will establish and maintain a minimum 500-foot exclusionary buffer by installing temporary flagging or fencing between the nest site and construction activities. Federal endangered species recovery permits are not required for least Bell's vireo surveys. State survey permits also may be required from the CDFW.	a. Biologist qualifications b. Notification of planned surveys c. Survey report d. Maps showing the proposed flagging or fencing areas e. Brief report of monitoring activities f. CPUC monitor: Line item in monthly report	a. At least one week prior to conducting surveys b. At least one week prior to surveys and per survey windows timing c. Within three weeks after surveys are completed and at least two weeks prior to construction d. At least 3 days prior to construction activities that would take place near the fenced area and/or as stipulated in Nesting Bird Management Plans (see MM BR-8) e. As stipulated in Nesting Bird Management	Applicant, SCE, CPUC, CDFW, USFWS * Applicable to all project components (all areas of suitable/ potentially suitable habitat)

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
			Plans (see MM BR-8) or by CPUC monitor f. Prior to and during construction	
	MM BR-10: Nesting Golden Eagle. Nesting surveys for golden eagles will be completed per the most recent USFWS survey guidelines by the applicant and SCE prior to project construction and will include areas within 660 feet of proposed project components located within suitable golden eagle nesting habitat. If surveys identify nesting golden eagles within 660 feet of the proposed project component areas, the applicant and SCE will ensure that all construction activities within 660 feet of the nest occur outside of the nesting season (January through June, subject to adjustment based on field observations). The nest will be monitored from outside the 660-foot buffer by a qualified raptor ecologist with demonstrated experience monitoring eagles and knowledge of normal eagle nesting behavior. In the event that the raptor ecologist observes abnormal behavior or notes any sign of potential disturbance to the nesting birds, the ecologist will ensure that work will be stopped within 1,320 feet of the nest. Work can continue within the buffered area(s) after the raptor ecologist determines that the chicks have fledged and the nest is not active for the season. In the event that golden eagle nests are identified on structures to be removed or modified, the structures will be left in place pending consultation with the USFWS and CDFW.	a. Biologist qualifications b. Notification of planned surveys c. Survey report d. Maps showing the proposed flagging or fencing areas e. Brief report of monitoring activities f. CPUC monitor: Line item in monthly report	a. At least one week prior to conducting surveys b. At least one week prior to surveys and per survey windows timing c. Within three weeks after surveys are completed and at least two weeks prior to construction d. At least 3 days prior to construction activities that would take place near the fenced area and/or as stipulated in Nesting Bird Management Plans (see MM BR-8) e. As stipulated in	Applicant, SCE, CPUC, CDFW, USFWS * Applicable to all project components (all areas of suitable habitat within 660 feet of project components)

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
			Nesting Bird Management Plans (see MM BR-8) or by CPUC monitor f. Prior to and during construction	
	Special Status Mammals			
	APM AQ-3: Minimization of Disturbed Areas. See above.			
	APM BR-2 through APM BR-6. See above.			
	MM BR-15: Restoration of Native Oak Trees: The applicant and SCE will take measures to avoid and minimize impacts to oak trees resulting from project construction activities, and will fully mitigate for any trees damaged or removed. The applicant and SCE will prepare oak tree evaluation surveys and oak tree mitigation plans prior to construction, and, after the completion of final engineering design of the project elements, the applicant and SCE will complete pre-construction surveys, and submit survey results to CPUC staff, to identify all individual trees of the oak genus indigenous to California located in the proposed project component areas. Oak trees will be identified by a qualified arborist (i.e., an arborist with extensive local or regional expertise in the planting, care and maintenance of oak trees), who will record a brief description of each tree (height, width, condition, and species). All construction activities that take place within the driplines of oak trees (i.e., the outermost extent of the canopy) that have the potential to damage or result in the removal of oak trees (e.g., more than 25 percent trimming of any individual oak tree canopy during one growing season, excavation or paving near oak trees, oak tree removal) will be monitored by a qualified arborist. Trimming, damage to, or loss of oak trees within the project construction areas shall not occur until the trees are evaluated by a qualified arborist, who shall identify appropriate measures to minimize tree loss which may	a. Arborist qualifications b. Oak tree survey and replacement plan, including surveys for oaks in the project component areas as necessary and proposed measures for tree replacement planting c. Final report of oak tree replanting d. CPUC monitor: Line item in monthly report	a. Prior to submittal of the oak tree survey and replacement plan b. At least 3 months prior to construction c. After arborist has determined that replacement trees at a 5:1 ratio have been established and will survive without monitoring or watering d. Prior to, during, and after construction	Applicant, SCE, CPUC * Applicable to all project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [a] and Consultation	Timing	Responsible Party and Project Component/s
	include the placement of fencing around the dripline, padding construction vehicles, or the placement of protective covering (matting) under the existing dripline during construction activities. If construction activities would lead to damage or the removal of any oak tree with a trunk of 8 inches or more in diameter at 4.5 feet ("breast height"), the tree will be replaced at a 4:1 ratio. Oak tree mitigation may be comprised of on-site or off-site planting of oak trees at the prescribed mitigation ratio (4:1) or through the purchase of mitigation bank credits from an approved mitigation bank. If a mitigation bank is utilized, the credit purchase shall equal the total area required for mitigation for the impacts (i.e., sufficient credits to meet or exceed the area needed for 4:1 replacement of impacted individual trees). The oak tree mitigation plans that will be submitted by the applicant and SCE to CPUC staff for review and approval prior to construction will include, at a minimum: 1. The estimated number of trees that will be damaged or removed during project construction; 2. Specific planting details (e.g., size of saplings, size of containers, proposed planting depth, and watering regimes; 3. Specific protection measures (e.g., measures to prevent damage to replacement oak tree plantings from animals and other sources); 4. Success criteria; 5. Monitoring and maintenance schedule; and 6. Proposed planting locations with specific baseline information on existing soil types, existing tree and shrub density, and proposed oak tree planting density and spacing. Replacement tree planting will be monitored by a qualified arborist, who will ensure the implementation of the following: 1. Planting of replacement trees will occur in suitable areas. The planting of replacement oak trees may occur on-site or off-site; 2. Replacement trees will be monitored for 5 years after initial planting for survivability (pursuant to a monitoring schedule established by the arborist); after the 5-year period, the			

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	arborist will evaluate whether the trees are capable of surviving without further maintenance; 3. Other measures determined necessary by the arborist to ensure the success of at least 75 percent of tree replacement plantings. Tree removal shall not be permitted until replacement trees have been planted or mitigation sites are approved by the CPUC staff.			
	MM BIO-11: Cover Steep-walled Trenches or Excavations during Construction. To prevent entrapment of wildlife, the applicant and SCE will ensure that all steep-walled trenches, auger holes, or other excavations will be covered at the end of each day or completely fenced off at night. For open trenches only, these may instead have earthen wildlife escape ramps within the trench maintained at intervals of no greater than 100 feet. These earthen ramps shall have a maximum slope not to exceed 2:1. The applicant's and SCE's biological monitor/s will inspect all trenches, auger holes, or other excavations a minimum of twice per day during non-summer months and a minimum of three times per day during the summer (hotter) months, and also immediately prior to back-filling. All non-special status wildlife species found will be safely removed and relocated out of harm's way, through the use of suitable tools such as a pool net when applicable. For safety reasons, biological monitors will under no circumstance enter open excavations.	a. Documentation by applicant or SCE monitor twice daily of appropriate trenching protections b. CPUC monitor: Line item in monthly report	a. During construction (ongoing trenching activities) b. During construction	Applicant, SCE, and CPUC * Applicable to all project components
	APM GE-2: Erosion and Sediment Control. See below.			
	APM HZ-6: Worker Environmental Awareness Training. See below.			
	Special Status Plants			
	APM AQ-3: Minimization of Disturbed Areas. See above.			
	APM AQ-4: Watering Prior to Grading and Excavation. See above.			
	APM HZ-6: Worker Environmental Awareness Training. See below.			
	MM BR-4: Restriction of Vehicular Traffic. See above.			

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	MM BR-12: Restoration of Plummer's Mariposa Lily and Slender Mariposa Lily. The applicant and SCE will complete pre-construction surveys during the appropriate blooming period to identify Plummer's mariposa lily and slender mariposa lily populations in the proposed project component areas at the storage field and in the area of the 66-kV subtransmission line. Plummer's mariposa lily and slender mariposa lily plants will be identified by a qualified biologist and flagged or surrounded with fencing in such a way that disturbance of the populations will be avoided. In the event that populations or individuals of either species cannot be avoided, the applicant and SCE will develop and implement restoration plans for both plants which will be reviewed and approved by CDFW prior to project construction. Restoration will occur after construction and to an extent such that "no net loss" (i.e., replacement of destroyed plants at a 1:1 ratio) is ensured for all plants of either species in the proposed project component areas. Restoration may be completed by: 1. Establishing Plummer's mariposa lily and slender mariposa lily plants within the proposed project areas (onsite); 2. Establishing Plummer's mariposa lily and slender mariposa lily plants outside the project areas (offsite); or 3. Purchase of credits and/or mitigation lands at a ratio above 1:1 from an entity reviewed and approved by CDFW. Details of the restoration plan will be pending consultation between the applicant and CDFW and/or SCE and CDFW. For Options 1. and 2. (establishing Plummer's mariposa lily and slender mariposa lily plants onsite or off-site), the plan will include the following elements: planting/seeding palettes; monitoring and contingency program; monitoring schedule, including duration and performance criteria (a minimum of 80 percent successful plant establishment after a minimum of three years); and any specific measures that will be required to ensure success of the restoration effort.	a. Biologist qualifications b. Notification of planned surveys c. Survey report d. Restoration plan e. Documentation of consultation with CDFW f. Final report of plant restoration g. CPUC monitor: Line item in monthly report	a. At least one week prior to surveys and prior to submittal of the restoration plan b. At least one week prior to surveys and per survey windows timing c. Within three weeks after surveys are completed and at least two weeks prior to construction d. At least one month prior to construction e. At least one month prior to construction f. After biologist has determined that replacement plants at a 1:1 ratio have been established and will survive without monitoring or watering g. Prior to, during, and after	Applicant, SCE, CPUC, CDFW * Applicable to storage field and 66-kV subtransmission line project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
			construction	
	MM BR-13: Non-Native and Invasive Plant Species. The applicant and SCE will avoid and reduce the spread of non-native and invasive plant species in the proposed project component areas through the following actions: 1. All equipment brought in from offsite that could transport soils, seeds, or other plant propagules (i.e., seeds, spores, tubers, or stems that can reproduce the plant) will be washed at a containment area to prevent introduction of unwanted plant material to the proposed project component areas; 2. All construction vehicles or equipment operating within the proposed project component areas in areas known to have noxious or invasive weeds will similarly be cleaned of any soils or plant materials before transport or re-deployment elsewhere within the proposed project component areas to prevent transferring weeds; 3. All soils, gravel, imported fill, or other construction materials brought from offsite that could inadvertently contain unwanted plant propagules will come from confirmed weed-free sources; 4. All seeds to be used in revegetation and reclamation activities will come from onsite, or from certified weed-free sources; and 5. All temporary disturbance areas not subject to existing infestations of invasive plants, including access roads, transmission line corridors, and towers will be monitored on a quarterly basis for one year after project construction is completed for invasive species establishment, and weed control measures will be initiated immediately upon evidence of invasive species introduction.	a. Documentation by applicant or SCE monitor weekly of appropriate actions b. Report of completion of monitoring of areas disturbed during project construction c. CPUC monitor: Line item in monthly report	a. During construction (weekly) b. One year after completion of project construction c. During and after construction	Applicant, SCE, CPUC * Applicable to all project components
Impact BR-2: Substantial adverse effect on riparian habitat or other sensitive	***Riparian Habitat***			
	APM AQ-3: Minimization of Disturbed Areas. See above.			
	APM BR-2: Designated Work Zones and Sensitive Resource Avoidance. See above.			
	APM BR-3: Post-construction Restoration for Reconductoring. See above.			

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
natural community.	**APM BR-5: Exclusionary Fencing.** See above.			
	APM GE-2: Erosion and Sediment Control. See below.			
	APM HZ-6: Worker Environmental Awareness Training. See below.			
	MM BR-1: Trimming of Vegetation. See above.			
	MM BR-5: Impacts on Hydrologic Features. See above.			
	MM BR-14: Minimize Impact on Riparian Habitat. The applicant and SCE will complete the following: 1. A qualified ecologist will survey and determine the spatial extent of riparian zones within the area of project disturbance in the areas of the storage field, the 66-kV subtransmission line, and Telecommunications Route #2; 2. Where riparian vegetation would be impacted by project construction activities, the applicant and SCE will consult with CDFW to determine if a Lake and Streambed Alteration Agreement pursuant to California Fish and Game Code Section 1600 would be necessary; and 3. In those areas where riparian vegetation is required to be removed, the applicant and SCE will work with a qualified arborist to determine the minimum amount of vegetation required to be removed in order to accommodate project construction, and the correct trimming procedures to employ.	a. Ecologist and arborist qualifications b. Notification of planned surveys c. Consultation with CDFW d. Section 1600 Streambed Alteration Agreement or letter of no effect (CDFW), as needed e. Maps showing spatial extent of riparian zones within the area of project disturbance in the areas of the storage field, the 66-kV subtransmission line, and Telecommunications Route #2 f. Report of minimization of vegetation removal g. CPUC monitor: Line item in monthly report	a. At least one week prior to conducting surveys b. At least one week prior to surveys and per survey windows timing c. Completion prior to construction d. Obtain permit or letter prior to construction e. Prior to construction within the project component area shown on the map f. Within 30 days after the completion of construction g. Prior to and during construction	Applicant, SCE, CPUC, CDFW * Applicable to storage field, 66-kV subtransmission line, and Telecommunications Route #2 project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [a] and Consultation	Timing	Responsible Party and Project Component/s
	Sensitive Natural Communities			
	APMs BR-1 through BR-7. See above.			
	APM AQ-3: Minimization of Disturbed Areas. See above.			
	MMs BR-1 through BR-10 and MM BR-12. See above.			
	MM BR-15: Restoration of Native Oak Trees.			
Impact BR-3: Substantial adverse effect on federally protected wetlands.	**APM AQ-3: Minimization of Disturbed Areas.** See above.			
	APM BR-2: Designated Work Zones and Sensitive Resource Avoidance. See above.			
	APM GE-2: Erosion and Sediment Control. See below.			
	MM BR-5: Impacts on Hydrologic Features. See above.			
Impact BR-4: Substantial interference with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impedance of the use of native wildlife nursery sites.	**APM BR-2: Designated Work Zones and Sensitive Resource Avoidance.** See above.			
Impact BR-5: Conflict with local policy and ordinance protecting oak trees.	**APM AQ-3: Minimization of Disturbed Areas.** See above.			
	APM AQ-4: Watering Prior to Grading and Excavation. See above.			
	MM BR-15: Restoration of Native Oak Trees. See above.			

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
4.5 Cultural Resources				
Impact CR-1: Substantial adverse change in the significance of an historical resource.	**APM CR-1: Conductor Pull and Tension Sites.** SCE will ensure that, where feasible, conductor pull and tension sites are located on existing level areas and existing roads to minimize the need for grading and cleanup.	a. Documentation (map) showing final locations of pull and tension sites b. CPUC monitor: Line item in monthly report	a. At least 3 days prior to construction b. During construction	SCE and CPUC *Applicable to 66-kV subtransmission line and Telecommunications Routes #1, #2, #3, #4 project components
	MM CR-4: Stop Work for Unanticipated Cultural Resources Discoveries. In the event that previously unidentified cultural resources are uncovered during implementation of the project, the applicant and SCE will ensure that ground-disturbing work is halted or diverted away from the discovery to another location. The CPUC staff-approved archeologist will inspect and review the discovery and determine whether further investigation is required. If the discovery is significant but can be avoided and no further impacts would occur, the resource will be documented appropriately and no further effort will be required. If the resource is significant but cannot be avoided and may be subject to further impact, the CPUC staff-approved archeologist will evaluate the significance of the resource based on eligibility for the California Register of Historical Resources (CRHR) or local registers and implement appropriate measures in accordance with the Archaeological Monitoring and Treatment Plans.	a. Archeologist qualifications b. Notification of CPUC monitor of stop work (email or phone call) c. Record of evaluation of find, determination of significance, appropriate documentation (if significant and avoidable), and plan for treatment and/or data recovery (if significant and unavoidable) d. CPUC monitor: Line item in monthly report	a. At least one week prior to construction b. Immediately upon work stoppage c. Within 3 weeks of find d. During construction	Applicant, SCE, and CPUC *Applicable to all project components
	MM CR-5: Cultural Resources Reporting. Prior to final inspection after construction of project components has been completed, the applicant's and SCE's qualified archaeologists as specified in the Archeological Monitoring and Treatment Plans will submit reports to CPUC staff summarizing all monitoring and mitigation activities and confirming that all mitigation measures have been implemented. If a cultural resource that meets the definition of a significant resource is encountered and data recovery is necessary, then a	a. Archeologist qualifications b. Record of evaluation of find, determination of significance, appropriate documentation (if significant and avoidable), and plan for treatment and/or data recovery (if	a. At least one week prior to construction b. Within 3 weeks of find c. Within one month after construction d. During and after	Applicant, SCE, and CPUC *Applicable to all project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [a] and Consultation	Timing	Responsible Party and Project Component/s
	data recovery program will be implemented for the resource that is approved by both the qualified archeologist/s and CPUC staff.	significant and unavoidable) (see c. under MM CR-4) c. Final report to CPUC staff documenting monitoring and mitigation activities, including data recovery program (if implemented) d. CPUC monitor: Line item in monthly report	construction	
	APM CR-2: Unidentified Cultural Resources. The applicant and SCE will ensure that, if previously unidentified cultural resources are unearthed during construction activities, construction will be halted in that area and directed away from the discovery until a qualified archaeologist assesses the significance of the resource. If determined to be required by the archeologist, the archaeologist will evaluate the significance of the discovered resources based on eligibility for the California Register of Historical Resources (CRHR) or local registers. Should any cultural resources be identified during construction activities in all project areas (including but not limited to culturally sensitive areas), the applicant and SCE will ensure that qualified archaeologists will monitor cultural resources mitigation and ground-disturbing activities in the area of the find. The size of the area of the find will be determined by the archeologist. The archaeologist will recommend appropriate measures to record, preserve, or recover the resources. Preliminary recommendations of CRHR eligibility made by the archaeologist will be reviewed by CPUC staff.	a. See a. under MM CR-4 b. See b. under MM CR-4 c. See c. under MM CR-4 d. Daily monitoring logs for areas with finds (if cultural resources are identified) e. CPUC monitor: Line item in monthly report	a. See a. under MM CR-4 b. See b. under MM CR-4 c. See c. under MM CR-4 d. Daily during construction (if cultural resources are identified) e. During and after construction	Applicant, SCE, and CPUC *Applicable to all project components
	APM HZ-6: Worker Environmental Awareness Training. See below.			
	MM CR-1: Archeological Monitoring and Treatment Plans. The applicant and SCE will retain the services of qualified cultural resources consultants who meet or exceed the U.S. Secretary of the Interior qualification standards for archaeologists published in 36 Code of Federal Regulations 61 and have experience working in	a. Archeologist qualifications b. Archeological Monitoring and Treatment Plans	a. At least 30 days prior to construction b. At least 30 days	Applicant, SCE, and CPUC *Applicable to all

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	the jurisdictions traversed by the project, sufficient that they can identify the full range of cultural resources that may be found in the region. The consultants will also have knowledge of the cultural history of the project area and will be approved by CPUC staff. Prior to construction, the applicant and SCE will submit Archeological Monitoring and Treatment Plans for the respective project components, prepared by the approved contractor for review and approval by CPUC staff. The intent of the Plans will be to address cultural resources eligible for the CRHR that cannot be preserved by avoidance and to identify areas where monitoring of earth-disturbing activities is required. Each monitoring plan shall include, at a minimum: • A list of personnel to which the plan applies; • Requirements, as necessary, and plans for continued Native American involvement and outreach, including participation of Native American monitors during ground-disturbing activities as determined appropriate; • Brief identification and description of the general range of the resources that may be encountered; • Identification of the elements of a site that would lead to it meeting the definition of a cultural resource requiring protection and mitigation; • Identification and description of resource mitigation that would be undertaken if required, such as flagging resources adjacent to work areas for avoidance; • Description of monitoring procedures that will take place for each project component area as required; • Description of how often monitoring will occur (e.g., full-time, part time, spot checking); • Description of the circumstances that would result in the halting of work; • Description of the procedures for halting work and notification procedures for construction crews;		prior to construction	project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	• Testing and evaluation procedures for resources encountered; • Description of procedures for curating any collected materials; • Reporting procedures; and • Contact information for those to be notified or reported to.			
	APM CR-4: Cultural Surveys After Final Project Siting. Once final siting for SCE project components is completed, SCE or its contractor will complete additional pedestrian surveys for cultural resources, for all areas of proposed disturbance that are not currently located in a built environment within the 66-kV subtransmission line reconductoring route, access roads, and staging areas; and Telecommunications Route #2, access roads, and staging areas. The information gathered from these surveys will be used to determine project planning and design in order to avoid sensitive resources and identify measures that would minimize impacts on sensitive resources from project-related activities. In addition, the results of these surveys will be used to determine the extent to which environmental specialist construction monitors will be required. The survey will result in a report detailing the research design, methods and results of the survey. This report will be submitted to CPUC staff.	a. Archeologist qualifications b. Notification of planned surveys c. Archeological Survey Reports d. CPUC monitor: Line item in monthly report	a. At least 30 days prior to construction b. At least one week prior to surveys and at least 30 days prior to construction c. At least 30 days prior to construction d. During construction (as needed)	SCE and CPUC *Applicable to 66-kV subtransmission line and Telecommunications Route #2 project components
	MM CR-2: Additional Cultural Resources Surveys. Prior to construction, the applicant and SCE will retain qualified archaeological contractor(s), as specified in the Archaeological Monitoring and Treatment Plans, to conduct intensive-level cultural resources surveys (transects no greater than 15 meters) for all areas to be disturbed that have not already been surveyed for cultural resources and, prior to the project, had previously been undisturbed. Reports that specify the research design, methods, and survey results will be submitted to CPUC staff for review. Cultural resources surveys for areas along Telecommunications Route #3 that are located more than 600 feet east of San Fernando Substation and along Telecommunications Route #4 south of Balboa Boulevard and north of Sharp Avenue will not be required, because these areas are located within developed residential	a. See a. under APM CR-4 b. See b. under APM CR-4 c. See c. under APM CR-4 d. See d. under APM CR-4	a. See a. under APM CR-4 b. See b. under APM CR-4 c. See c. under APM CR-4 d. See d. under APM CR-4	SCE and CPUC *Applicable to 66-kV subtransmission line and Telecommunications Route #2 project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [a] and Consultation	Timing	Responsible Party and Project Component/s
	neighborhoods that are previously disturbed.			
	MM CR-3: Construction Monitoring. Prior to issuance of grading permit(s), the applicant and SCE will retain qualified archaeologists as specified in the Archeological Monitoring and Treatment Plans to monitor cultural resources mitigation and ground-disturbing activities in culturally sensitive areas. Culturally sensitive areas would include those areas along the 66-kV subtransmission line reconductoring routes and Telecommunications Route #3 and #4 and within the storage field that have not previously been disturbed. Cultural resources monitoring for areas along Telecommunications Route #3 that are located more than 600 feet east of San Fernando Substation and areas along Telecommunications Route #4 south of Balboa Boulevard and north of Sharp Avenue will not be required because these areas are located within developed residential neighborhoods that are previously disturbed. The qualified archaeologists will attend preconstruction meetings to provide comments and/or suggestions concerning monitoring plans and discuss excavation plans with excavation contractors.	a. Archeologist qualifications b. Brief report of monitoring activities, recorded daily c. CPUC monitor: Line item in monthly report	a. At least 30 days prior to construction b. Monthly during construction if no cultural resources finds; daily during construction if cultural resources are identified (per APM CR-2) c. During construction	Applicant, SCE, and CPUC *Applicable to all project components
Impact CR-2: Substantial adverse change in the significance of an archaeological resource.	See Impact CR-1, above.			

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
Impact CR-3: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	**MM CR-6: Paleontological Monitoring and Treatment Plans.** Prior to construction, the applicant and SCE will retain CPUC staff-approved paleontologists to prepare Paleontological Monitoring and Treatment Plans, and submit to CPUC staff for review and approval. The CPUC staff-approved paleontologists will have knowledge of the local paleontology and be familiar with paleontological procedures and techniques. The Paleontological Monitoring and Treatment Plans will: • Follow Society of Vertebrate Paleontology guidelines and meet all regulatory requirements; • Address the 66-kV subtransmission line reconductoring routes, Telecommunications Route #2, Telecommunications Route #3, Telecommunications Route #4, Natural Substation, guardhouse, and entry road widening sites; • Identify construction impact areas of moderate to high sensitivity for encountering potential paleontological resources and the shallowest depths at which those resources may be encountered; • Detail the criteria to be used to determine whether an encountered resource is significant and if it should be avoided or recovered for its data potential; • Detail methods of recovery, preparation and analysis of specimens, final curation of specimens at a federally accredited repository, data analysis, and reporting; • Outline coordination strategies to ensure that CPUC staff-approved paleontological monitors will conduct full-time monitoring of all grading activities in sediments determined to have a moderate to high sensitivity. For sediments of low or undetermined sensitivity, the Paleontological Monitoring and Treatment Plans will specify what level of monitoring is necessary. Sediments with no sensitivity will not require paleontological monitoring; • Define specific conditions in which monitoring of earthwork	a. Paleontologist qualifications b. Paleontological Monitoring and Treatment Plans	c. At least 30 days prior to construction d. At least 30 days prior to construction	Applicant, SCE, and CPUC *Applicable to 66-kV subtransmission line, Telecommunications Routes #2, #3, #4, Natural Substation, guardhouse, and entry road widening site project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	activities could be reduced and/or depth criteria established to trigger monitoring. These factors will be defined by the CPUC staff-approved paleontologists.			
	MM CR-7: Paleontology Sensitivity Training. Prior to the initiation of construction or ground-disturbing activities in areas with high paleontological sensitivity, the applicant and SCE shall ensure that all construction personnel conducting rough grading shall be trained regarding the recognition of possible subsurface paleontological resources and protection of all paleontological resources during construction grading. The applicant and SCE will complete training for all applicable personnel. Training will inform all applicable personnel of the procedures to be followed upon the discovery of paleontological resources. All personnel will be instructed that unauthorized collection or disturbance of protected fossils on- or off-site by the applicant or SCE or their representatives or employees is illegal and that violators shall be subject to prosecution under appropriate federal and state laws. Unauthorized resource collection or disturbance may constitute grounds for the issuance of a stop work order.	a. Qualifications of paleontologist to conduct training b. Documentation of training as described in MM CR-7, including documentation of CPUC monitor's attendance at first paleontological resources training session. c. Records of trained personnel and training session logs (maintained and kept on site by construction lead) d. CPUC monitor: Line item in monthly report	a. At least 30 days prior to construction b. Prior to construction c. During construction (updated periodically) d. During construction	Applicant, SCE, and CPUC * Applicable to all project components
	MM CR-8: Paleontology Construction Monitoring. Based on the Paleontological Monitoring and Treatment Plans, the applicant and SCE will conduct paleontological monitoring using CPUC staff-approved paleontological contractor. This will include monitoring during rough grading and trenching in areas determined to have high paleontological sensitivity and that have the potential to be shallow enough to be adversely affected by such earthwork as determined by the CPUC staff-approved Paleontological Monitoring and Treatment Plans.	a. Paleontologist qualifications b. Brief report of monitoring activities, recorded daily c. CPUC monitor: Line item in monthly report	a. At least 30 days prior to construction b. Monthly during construction if no paleontological resources finds; daily during construction if paleontological resources are identified c. During	Applicant, SCE, and CPUC *Applicable to 66-kV subtransmission line, Telecommunications Routes #2, #3, #4, Natural Substation, guardhouse, and entry road widening site project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
			construction	
	MM CR-9: Stop Work for Unanticipated Paleontological Discoveries. In the event that previously unidentified paleontological resources are uncovered during implementation of the project, the applicant and SCE will ensure that ground-disturbing work would be halted or diverted away from the discovery to another location. A CPUC staff-approved paleontologist would inspect the discovery and determine whether further investigation is required. If the discovery is significant but can be avoided and no further impacts would occur, the resource would be documented in the appropriate paleontological resource records and no further effort would be required. If the resource is significant but cannot be avoided and may be subject to further impact, the CPUC staff-approved paleontological monitor would evaluate the significance of the resource and implement appropriate measures in accordance with the Paleontological Monitoring and Treatment Plans.	a. Paleontologist qualifications b. Notification of CPUC staff of potential discovery and stop work (email or phone call) c. Record of evaluation of find, determination of significance, appropriate documentation of each discovery in appropriate paleontological resource records (if significant and avoidable), and documentation of measures taken or to be taken by paleontological monitor per the Paleontological Monitoring and Treatment Plans (if significant and unavoidable) d. CPUC monitor: Line item in monthly report	a. At least one week prior to construction b. Immediately upon discovery c. Within 3 weeks of find d. During construction	Applicant, SCE, and CPUC *Applicable to all project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
Impact CR-4: Disturb any human remains, including those interred outside of formal cemeteries.	**APM CR-3: Human Remains.** The applicant and SCE will ensure that, if human remains are encountered during construction or any other phase of development, work will be halted in the area and directed away from the discovery. The County Coroner will be notified within 24 hours of the discovery. No further disturbance will occur in the area of the discovery until the County Coroner makes the necessary findings of origin and disposition pursuant to Public Resources Code 5097.98–99, Health and Safety Code 7050.5. If the coroner determines that the burial is not historic, but prehistoric, the Native American Heritage Commission (NAHC) will be contacted to determine the most likely descendent (MLD) for this area. The MLD may become involved with the disposition of the burial following scientific analysis. If the remains are determined to be Native American, the Native American Heritage Commission will be notified within 24 hours as required by Public Resources Code 5097. CPUC staff will mediate any disputes regarding treatment of remains.	a. Notification of CPUC of potential discovery and stop work (email) b. Documentation of notification of County Coroner within 24 hours of discovery (email) c. Documentation of the County Coroner's findings of origin and disposition (email) d. If County Coroner determines that the burial is not prehistoric, but historic: Documentation of notification of Native American Heritage Commission e. CPUC monitor: Line item in monthly report	a. Within one hour of potential discovery b. Immediately upon notification c. Immediately upon receipt of findings of origin and disposition d. Within 24 hours of County Coroner's determination e. During construction	Applicant, SCE, and CPUC *Applicable to all project components
	APM CR-4: Cultural Surveys After Final Project Siting. See above.			
	MM CR-1: Cultural Resources Plan. See above.			
	MM CR-2: Additional Cultural Resources Surveys. See above.			
	MM CR-3: Construction Monitoring. See above.			
	MM CR-4: Stop Work for Unanticipated Cultural Resources Discoveries. See above.			
	MM CR-5: Cultural Resources Reporting. See above.			
	MM CR-10: Paleontological Data Recovery. Prior to final inspection after construction of project components has been completed, if avoidance of significant paleontological resources is not feasible during grading, treatment (including recovery, specimen preparation, data analysis, curation, and reporting) will be carried out by the applicant and SCE in accordance with the	a. Documentation of treatment per the Paleontological Monitoring and Treatment Plans	a. Prior to final inspection after construction of project components has	Applicant, SCE, and CPUC *Applicable to all project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	approved Paleontological Monitoring and Treatment Plans.		been completed	
4.6 Geology, Soils, and Mineral Resources				
Impact GE-1: Expose people or structures to risk of loss, injury, or death involving rupture of a known earthquake fault.	**APM GE-1: Geotechnical Studies.** The applicant will ensure that, for the construction of the Central Compressor Station, construction procedures will be conducted as discussed in the recommendations sections of the Preliminary Geotechnical Investigation Reports prepared by Globus (2006) and Mactec (2011) to avoid impacts related to unstable geologic conditions. In addition, pre-engineering geotechnical studies will be completed by the applicant and SCE for the proposed Natural Substation and select TSP locations prior to construction. The pre-engineering geotechnical studies will evaluate the depth to the water table; document evidence of faulting; and determine liquefaction potential, physical properties of subsurface soil, soil resistivity, slope stability, and the presence of hazardous materials. The applicant and SCE will further ensure that, for the construction of the Natural Substation and select TSP locations, construction procedures will be conducted as discussed in the recommendations section of the geotechnical studies report.	a. Geotechnical studies report for Natural Substation and select TSP locations b. CPUC monitor: Line item in monthly report	a. Prior to construction b. During construction	Applicant, SCE, and CPUC *Applicable to the Central Compressor Station and Natural Substation project components, and select TSP locations (as identified by the geotechnical studies)
Impact GE-2: Expose people or structures to the risk of loss, injury, or death involving strong seismic ground shaking.	**APM GE-1: Geotechnical Studies.** See above.			

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
Impact GE-3: Expose people or structures to the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.	**APM GE-1: Geotechnical Studies.** See above.			
Impact GE-4: Expose people or structures to the risk of loss, injury, or death involving landslides.	**APM GE-1: Geotechnical Studies.** See above.			
Impact GE-5: Result in substantial soil erosion or the loss of topsoil.	**APM AQ-3: Minimization of Disturbed Areas.** See above.			
	APM GE-2: Erosion and Sediment Control. The applicant and SCE will ensure that erosion and sediment control measures will be implemented in each of the project component areas during construction activities to reduce the amount of soil displaced and transported to other areas by storm water, wind, or other natural forces. To minimize site disturbance, the applicant and SCE or their respective construction contractors will: • Remove only the vegetation that is absolutely necessary to remove (e.g., trim or mow instead of grub where feasible); • Avoid off-road vehicle use outside work zones; and • Instruct all construction personnel on storm water pollution prevention concepts to ensure they are conscious of how their actions affect the potential for erosion and sedimentation.	a. Documentation of training of construction personnel on storm water pollution prevention concepts (see APM HZ-6: Worker Environmental Awareness Training Program), maintained and kept on site by construction lead b. Final approved Stormwater Pollution Prevention Plans (SWPPPs), maintained and kept on site by construction lead c. CPUC monitor: Line item in monthly report	a. Prior to and during construction b. Prior to and during construction c. During construction	Applicant, SCE, and CPUC *Applicable to all project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [a] and Consultation	Timing	Responsible Party and Project Component/s
	MM BR-5: Impacts on Hydrologic Features. See above.			
Impact GE-6: Located on a geologic unit or soil that is or would become unstable and result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	**APM GE-1: Geotechnical Studies.** See above.			
Impact GE-7: Located on expansive soil.	**APM GE-1: Geotechnical Studies.** See above.			
4.7 Greenhouse Gases				
Impact GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	**APM AQ-1: Maintain Engines in Good Working Condition.** See above.			
	APM AQ-2: Minimization of Equipment Use. See above.			
	APM GHG-1: Engine Maintenance. The applicant and SCE will ensure that construction and operations vehicle equipment engines are maintained in good condition and in proper tune according to manufacturer specifications.	CPUC monitor: Line item in monthly report (see APM AQ-1)	During construction	Applicant, SCE, and CPUC *Applicable to all project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	APM GHG-2: Scheduling. The applicant and SCE will ensure that staff and daily construction activities for each of the project components are efficiently scheduled to minimize the use of unnecessary/duplicate equipment when possible.	CPUC monitor: Line item in monthly report (see APM AQ-2)	During construction	Applicant, SCE, and CPUC *Applicable to all project components
4.8 Hazards and Hazardous Materials				
Impact HZ-1: Significant hazard from routine transport, use, or disposal of hazardous materials.	**APM HZ-7: Wood Pole Recycling and Disposal.** SCE will ensure that utility pole and other utility wood waste is reused by SCE, returned to the manufacturer, disposed of in a Class I hazardous waste landfill, or disposed of in the lined portion of a municipal landfill certified by the associated Regional Water Quality Control Board.	CPUC monitor: Line item in monthly report	During construction	SCE and CPUC *Applicable to the 66-kV subtransmission line and Telecommunications Routes #1, #2, #3, and #4 project components
	APM HZ-3: Hazardous Materials Spill and Release Prevention. The applicant and SCE will ensure that construction procedures are implemented to minimize the potential for hazardous material spills and releases in each of the project component areas.	a. Construction procedures for minimizing spill potential, including Spill Prevention, Control, and Countermeasure (SPCC) Plans, as maintained and kept on site by the construction lead b. CPUC monitor: Line item in monthly report	a. Prior to and during construction b. Prior to and during construction	Applicant, SCE, and CPUC *Applicable to all project components
	APM HZ-5: Hazardous Materials Use and Storage and Hazardous Waste. The applicant and SCE will ensure the following during construction of the proposed project components: • All hazardous materials (including fuels, lubricants, and cleaning solvents) will be stored, handled, and used in accordance with applicable regulations. • For all hazardous materials in use at construction sites, Material Safety Data Sheets will be available for routine or emergency	a. Hazardous Material Safety Data Sheets, maintained and kept on site by the construction lead and project operator; SWPPPs for construction and operation b. CPUC monitor: Line item	a. Prior to and during construction, and during operation b. Prior to and during construction	Applicant, SCE, and CPUC *Applicable to all project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	use. In addition, the applicant will ensure the following for the storage field project components during construction: • All hazardous materials planned for use or storage at the storage field site during construction of the proposed Central Compressor Station will be preapproved by the applicant's designated safety staff. Approval of hazardous materials will be determined only after full review of the Material Safety Data Sheet for the proposed material. • Hazardous materials storage locations at the storage field will be determined based on the storm water pollution prevention plan and storage field policy. Existing materials are stored within the storage field's hazardous material and hazardous waste storage area. The applicant and SCE will also ensure the following during operation of the proposed project components: • All hazardous and nonhazardous wastes generated during operation of the proposed project (e.g., waste oil and gas condensates from the compressor station) will be classified and managed in accordance with federal and state regulations and site-specific permits. • All hazardous materials (including fuels, lubricants, and cleaning solvents) will be stored, handled, and used in accordance with applicable regulations.	in monthly report		
	APM HZ-6: Worker Environmental Awareness Training. Prior to construction, the applicant and SCE will develop and implement Worker Environmental Awareness Training Programs based on the final engineering design, the results of preconstruction surveys, and a list of mitigation measures developed by CPUC staff to mitigate significant environmental effects of the proposed project. Prior to start of work, presentations will be prepared by the applicant and SCE and shown to all workers who will be present on the proposed project component sites during construction. A record of all trained personnel (including logs of training sessions signed by all workers	a. Documentation of Worker Environmental Awareness Training Program (WEATP) course as described in APM HZ-6 b. Documentation of attendance of CPUC mitigation monitor for first WEATP training session.	a. Prior to and during construction b. Prior to construction c. Prior to and during construction	Applicant, SCE, and CPUC *Applicable to all project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [a] and Consultation	Timing	Responsible Party and Project Component/s
	who attended each session) will be kept with the construction foreman. CPUC staff will conduct regular (monthly and random) audits to ensure that workers on the project component sites have received the appropriate training. Audits will include worker tests and/or interviews to confirm adequate instruction in construction procedures and mitigation measures. All construction personnel will receive the following: 1. Instruction for compliance with project component site-specific biological or cultural resource protective measures and mitigation measures that are developed after preconstruction surveys; 2. A list of phone numbers for key personnel associated with the proposed project including the archaeological and biological monitors, environmental compliance coordinator, and regional spill response coordinator; 3. Instruction on the South Coast Air Quality Management District Fugitive Dust and Ozone Precursor Control Measures and Portable Engine Operating Parameters; 4. Direction that site vehicles must be properly muffled; 5. Instruction on what typical cultural resources look like, and instruction that if cultural resources are discovered during construction, to suspend work in the vicinity of the find and contact the site supervisor and archeologist or environmental compliance coordinator; 6. Instruction on how to work near any Environmentally Sensitive Areas delineated by archeologists or biologists; 7. Instruction on individual responsibilities under the Clean Water Act, the applicant's and SCE's storm water pollution prevention plans, site-specific best management practices, hazardous materials and waste management requirements, and the location of Material Safety Data Sheets as needed for each proposed project component; 8. Instructions to notify the site supervisor and regional spill response coordinator in the event of hazardous materials spills	c. Record of trained personnel and training session log maintained and kept on site with construction lead d. CPUC monitor: Line item in monthly report		

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	or leaks from equipment or upon the discovery of soil or groundwater contamination; 9. A copy of the truck routes to be used for material delivery; and 10. Instruction that non-compliance with any laws, rules, regulations, or mitigation measures could result in being barred from participating in any remaining construction activities associated with the proposed project components.			
Impact HZ-2: Significant hazard from accident conditions involving the release of hazardous materials.	**APM HZ-3: Hazardous Materials Spill and Release Prevention.** See above.			
	APM HZ-4: Contaminated Soil Disposal. The applicant and SCE will ensure that any soil from excavation and grading activities that is suspected of being contaminated with oil or other hazardous materials is characterized and disposed offsite at an appropriately licensed waste facility.	CPUC monitor: Line item in monthly report	During construction	Applicant, SCE, and CPUC *Applicable to all project components
	APM HZ-5: Hazardous Materials Use and Storage and Hazardous Waste. See above.			
	APM HZ-6: Worker Environmental Awareness Training. See above.			
	MM HZ-1: Contaminated Soils Contingency Plan. The applicant will prepare a Contaminated Soils Contingency Plan that would outline procedures for testing soils in locations where contaminated soils are suspected to be present including the office building and Central Compressor Station site locations. The Contaminated Soils Contingency Plan will also outline the steps that would be implemented if contaminated soils are encountered during pre-construction soil sampling and testing or if they are encountered at any point during construction. Provisions outlined in this plan would include phone numbers of city, county, state, and federal agencies and primary, secondary, and final cleanup procedures. In addition, the plan would address health and safety procedures to minimize environmental impacts in the event that hazardous soils or other materials are encountered during construction of the project, including measures such as worker training, containerization and storage, and monitoring. The plan would also establish security measures to prevent unauthorized entry to cleanup sites and to reduce hazards outside the investigation/cleanup area and would	a. Contaminated Soils Contingency Plan b. Brief report of monitoring activities, if required c. CPUC monitor: Line item in monthly report	a. Prior to construction b. As needed during construction, as part of monthly reporting c. Prior to and during construction	Applicant and CPUC *Applicable to all storage field project components constructed by the applicant

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	identify appropriate, licensed disposal facilities, and haulers.			
Impact HZ-3: Emit hazardous emissions or involve handling hazardous materials, substances, or waste within one-quarter miles of an existing or proposed school.	**APM HZ-3: Hazardous Materials Spill and Release Prevention.** See above.			
	APM HZ-5: Hazardous Materials Use and Storage and Hazardous Waste. See above.			
	APM HZ-6: Worker Environmental Awareness Training. See above.			
Impact HZ-4: Be located on a site that is included on a list of hazardous materials sites.	**MM HZ-1: Contaminated Soils Contingency Plan.** See above.			
Impact HZ-5: Safety hazards for people residing or working in the project component areas that are within the area of an airport land use plan or within two miles of an airport.	**APM HZ-1: Federal Aviation Administration Consultation.** SCE would file the necessary FAA Form 7460 for structures (poles/towers/conductors) that exceed notification requirements outlined in FAA Part 77. SCE would file the form upon completion of final engineering and prior to construction per FAA Part 77. All FAA recommendations, including the marking of conductor and installation of warning lights on TSPs will be implemented into the design of the project as appropriate.	a. Record of FAA consultation and forms filed (if required by FAA Part 77) b. CPUC monitor: Line item in monthly report	a. Prior to construction b. Prior to and during construction	SCE and CPUC *Applicable to all SCE project components that exceed notification requirements outlined in FAA Part 77
Impact HZ-6: Impair implementation of or physically interfere with an adopted	**MM HZ-2: Construction Fire Control and Emergency Response Measures.** To address the risk of fire during construction of the proposed project components, the applicant and SCE will develop fire control and emergency response measures as part of the Construction Safety and Emergency Response Plans developed in consultation with their contractors for use during construction of the	a. Construction Safety and Emergency Response Plans and Fire Control and Emergency Response Measures	a. Prior to and during construction b. Prior to and during	Applicant, SCE, and CPUC *Applicable to all project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [a] and Consultation	Timing	Responsible Party and Project Component/s
emergency response plan or emergency evacuation plan.	proposed project components. The Construction Fire Control and Emergency Response Measures will describe fire prevention and response practices that the applicant and SCE will implement during construction of the proposed project components to minimize the risk of fire, and, in the case of fire, provide for immediate suppression and notification. SCE's Construction Fire Control and Emergency Response Measures will also be generally consistent with SCE's Specification E-2005-104, Transmission Line Project Fire Plan (February 21, 2006), and SCE's fire prevention plan prepared pursuant to CPUC Decision 12-01-032. The Construction Fire Control and Emergency Response Measures shall specify that the applicant and SCE, or the respective construction contractors, shall furnish all supervision, labor, tools, equipment, and material necessary to prevent starting any fire, control the spread of fires if started, and provide assistance for extinguishing fires started as a result of project construction activities. Labor shall include the assignment of Fire Risk Managers who will be present at each proposed project component area during construction activities, whose sole responsibility will be to monitor the contractor's fire-prevention activities, and who will have full authority to stop construction in order to prevent fire hazards. If construction activities take place concurrently at more than one project component area, and such areas are close by in proximity (e.g., within the storage field area), one Fire Risk Manager may monitor more than one project component area during the same period of construction. 1. The Fire Risk Managers shall: a) Be responsible for preventing, detecting, controlling, and extinguishing fires set accidentally as a result of construction activity; b) Review the Fire Control and Emergency Response Measures with construction employees prior to starting work at each project area; c) Ensure that all construction personnel are trained in fire	b. CPUC monitor: Line item in monthly report	construction	

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [a] and Consultation	Timing	Responsible Party and Project Component/s
	safety measures relevant to their responsibilities. At a minimum, construction personnel shall be trained in incipient stage fire prevention, control, and extinguishing (e.g., the fire can be controlled or extinguished by portable fire extinguishers, small hose systems, or portable water supplies without the need for protective clothing or breathing apparatus), and fire reporting. Each member of the construction crew shall be trained and equipped to extinguish small fires; d) Ensure that no personnel shall fight a fire beyond the incipient stage and/or after the arrival of professional fire suppression personnel (local Fire Departments of CAL FIRE personnel); e) Ensure that Fire Risk Manager and all construction crews are provided with radio and cellular telephone access that is operational within each project area to allow for immediate reporting of fires, by ensuring that communication pathways and equipment are tested and confirmed operational each day prior to initiating construction activities at each project component area; and f) Maintain an updated key personnel and emergency services contact (telephone and email) list, kept onsite and made available as needed to construction personnel. 2. Equipment shall include: a) Spark arresters that are in good working order and meet applicable regulatory standards for all diesel and gasoline internal combustion engines, stationary and mobile; b) One shovel and one pressurized chemical fire extinguisher for each motorized vehicle or each gasoline-powered tool (if not accompanied by a motorized vehicle), including but not restricted to compressors, hydraulic accumulators, gardening tools (such as chain saws and weed trimmers), soil augers, rock drills, etc.; c) Fire suppression equipment to be kept on all vehicles			

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	used for project construction; and d) An onboard fire extinguisher capable of extinguishing any equipment-caused fire to be kept on heavy construction operating equipment. 3. Measures to be undertaken by the applicant, SCE or the respective construction contractors, and monitored and enforced by the Fire Risk Manager, at each of the project areas during construction activities, shall include: a) The installation of fire extinguishers at the proposed Central Compressor Station site; b) The prohibition of smoking at each construction job site as follows: no smoking in wildland areas; no smoking during operation of light or heavy equipment; limit smoking to paved areas or areas cleared of all vegetation; no smoking within 30 feet of any area in which combustible materials (including fuels, gases, and solvents) are stored; no smoking in any project construction areas during any Red Flag Warnings that apply to the area; c) The posting of no smoking signs and fire rules on the project bulletin board at all contractor field offices and areas visible to employees during fire season; d) The maintenance of all construction areas in an orderly, safe, and clean manner. All oily rags and used oil filters shall be removed from project construction areas. After construction activities are completed in each project area, the area shall be cleaned of all trash and surplus materials. All extraneous flammable materials shall be cleared from equipment staging areas and parking areas; e) Confinement of welding activities to cleared areas having a minimum radius of 10 feet measured from place of welding, and observed by the Fire Risk Manager; f) Prevention of the idling of vehicles with hot exhaust manifolds on dirt roads with dead combustible vegetation under the vehicle;			

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [a] and Consultation	Timing	Responsible Party and Project Component/s
	g) The provision of portable communication devices (i.e., radio or mobile telephones) as needed to construction personnel and communication protocols for onsite workers to coordinate with local agencies and emergency personnel in the event of fire or other emergencies during construction or operation of the proposed project; h) Ensuring that at least one crew member is within 100 yards at all times of a vehicle containing equipment necessary for fire suppression as outlined above; i) The immediate reporting of all fires to the Fire Risk Manager in the project component area; and j) Any additional measures as needed during construction to address fire prevention and detection, to lower the risk of wildland fires. 4. Measures will also include the following requirements that would involve coordination between the applicant and SCE, and the Fire Departments and CAL FIRE: a) The applicant's and SCE's respective Fire Risk Managers shall serve as liaisons to the Fire Departments and CAL FIRE during the project's construction phase and provide a point of contact for the Fire Departments and CAL FIRE in the event of a fire emergency; b) The applicant and SCE or the respective construction contractors shall abide by all restrictions to construction activity that may be enforced by the Fire Departments and/or CAL FIRE during Red Flag Warning days; and c) In the event that SCE or their construction contractor sets fire to incinerate cleared vegetation, the Fire Risk Manager shall notify the Fire Departments and/or CAL FIRE in advance of the burning. Special care shall be taken to prevent damage to adjacent structures, trees, and vegetation. The applicant will not burn cleared vegetation during construction activities. 5. Measures will also include additional, special provisions for days when the National Weather Service issues a Red Flag			

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [a] and Consultation	Timing	Responsible Party and Project Component/s
	Warning. Standard protocols implemented during these periods will include: a) Measures to address storage and parking areas; b) Measures to address the use of gasoline-powered tools; c) Procedures for road closures as necessary; d) Procedures for use of a fire guard as necessary; and Additional fire suppression tools and fire suppression equipment, and training requirements.			
Impact HZ-7: Expose people or structures to a significant risk involving wildland fires.	**MM HZ-2: Construction Fire Control and Emergency Response Measures.** See above.			
	MM HZ-3: Fire Department Review and Coordination. Prior to construction of the proposed project components, the applicant and SCE will coordinate with the City of Los Angeles Fire Department, and the Los Angeles County and Ventura County Fire Departments (Fire Departments) according to the location of the proposed project components. The applicant and SCE will submit the following materials ("fire management information") for review by the Fire Departments: proposed project components and design, specific construction methods and equipment, and a description of plans and measures including but not limited to the applicant's Fire/Emergency Action Plan, SCE's Fire Management Plan, the applicant's and SCE's Construction Safety and Emergency Response Plans, and measures that would be undertaken by the applicant and SCE to further address risks involving wildland fires during construction and operation of the proposed project components (including Fire Control and Emergency Response Measures). The Fire Departments will review the applicant and SCE's fire management information prior to construction and operation (as appropriate) of the proposed project components, in accordance with each respective fire department's codes, regulations, ordinances, guidelines, and other policy which may guide such review, including but not limited to: 1. The County of Los Angeles Fire Code (2011), including permits as required under Chapter 1, Section 105; Chapter 3, Section 325 (Clearance of Brush and Vegetative Growth);	a. Record of coordination with fire departments and written confirmation of review of the fire management information documentation specified in MM HZ-3 submitted to the fire departments b. Record of fire department review of Storage Field Fire/Emergency Action Plan revisions for Central Compressor Station operation c. CPUC monitor: Line item in monthly report	a. Prior to and during construction b. Prior to operations c. Prior to construction and prior to operations	Applicant, SCE, and CPUC *Applicable to all project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [a] and Consultation	Timing	Responsible Party and Project Component/s
	Chapter 4 (including Section 404.3.2, Fire Safety Plans, and 408.7.5, Emergency Plan); and Chapter 14 (fire safety during construction and demolition); 2. The County of Los Angeles Building Code (2011), which would apply to buildings within the project area that would require plan review from the County of Los Angeles Fire Department; and 3. CAL FIRE's Power Line Fire Prevention Field Guide (2008). The Fire Departments will submit written confirmation of the completion of this review to the applicant and SCE prior to project construction and operation. The applicant will also submit any revisions of the facility Fire/Emergency Action Plan related to operation of the Central Compressor Station, for the same level of review, prior to the start of project operations at the storage field.			
4.9 Hydrology and Water Quality				
Impact HY-1: Violate water quality standards or waste discharge requirements.	**APM AQ-3: Minimization of Disturbed Areas.** See above.			
	APM AQ-4: Watering Prior to Grading and Excavation. See above.			
	APM AQ-6: Fugitive Dust from High Winds. See above.			
	APM BR-3: Post-construction Restoration for Reconductoring. See above.			
	APM GE-1: Geotechnical Studies. See above.			
	APM GE-2: Erosion and Sediment Control. See above.			
	APM HZ-3: Hazardous Materials Spill and Release Prevention. See above.			
	APM HZ-4: Contaminated Soil Disposal. See above.			
	APM HZ-5: Hazardous Materials Use and Storage and Hazardous Waste. See above.			
	APM PS-1: Site Cleanup. See below.			
	APM PS-2: Nonhazardous Waste Management. See below.			
Impact HY-3: Substantial	**APM AQ-3: Minimization of Disturbed Areas.** See above.			
	APM BR-3: Post-construction Restoration for Reconductoring. See above.			

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [a] and Consultation	Timing	Responsible Party and Project Component/s
alteration of the existing drainage pattern of the site or area.	**APM GE-2: Erosion and Sediment Control.** See above.			
	MM BR-5: Impacts on Hydrologic Features. See above.			
Impact HY-8: Risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow.	**APM GE-1: Geotechnical Studies.** See above.			
	APM GE-2: Erosion and Sediment Control. See above.			
4.10 Land Use and Planning				
No applicable APMs or mitigation measures.				
4.11 Noise				
Impact NS-1: Noise levels in excess of standards established in the local general plan or noise ordinance.	**APM NS-1: Construction Hours.** The applicant and SCE will ensure that construction of the proposed project components will comply with all applicable City of Los Angeles, City of Santa Clarita, County of Los Angeles, and County of Ventura noise regulations. Construction activities will generally be scheduled during daylight hours (7:00 a.m. to 5:00 p.m.) Monday through Friday and some Saturdays.	CPUC monitor: Line item in monthly report	During construction	Applicant, SCE, and CPUC *Applicable to all project components
	APM NS-2: Construction Noise Control Plan. SCE will prepare and implement a noise control plan to address all SCE structure installation/replacement and substation modifications associated with the SCE-proposed project components. Construction measures required by the Noise Control Plan will include, but not be limited to, the following: • Stockpiling and vehicle staging areas will be located as far away from occupied residences as possible; • All stationary construction equipment will be operated as far away from residential uses as possible; • To the extent feasible, haul routes for removing excavated materials or delivery of materials from each respective project	a. Construction Noise Control Plan b. CPUC monitor: Line item in monthly report	a. Prior to and during construction b. During construction	SCE and CPUC *Applicable to all SCE project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	component site will be designed to avoid residential areas and areas occupied by residential receptors (e.g., hospitals, schools, convalescent homes, etc.); and • Idling construction equipment will be turned off when not in use for periods longer than 15 minutes.			
	APM NS-3: Notification Procedures. At least two weeks prior to construction, the applicant and SCE will notify all property owners within 300 feet of construction activities.	a. Record of property owner notification b. CPUC monitor: Line item in monthly report	a. At least 2 weeks prior to construction b. Prior and/or during construction	SCE and CPUC *Applicable to all SCE project components
	MM NS-1: Noise Reduction and Control Practices. SCE will employ the following noise reduction and control practices during subtransmission line reconductoring and fiber optic installation activities that could produce noise levels above 80 dBA Leq near sensitive receptors (within 100 feet): • Construction equipment, stationary or mobile, will be equipped with properly operating and maintained mufflers on engine exhausts and compressor components. • Construction equipment specifically designed for low noise emissions (i.e., equipment that is powered by electric or natural gas engines instead of diesel or gasoline reciprocating engines) will be used as much as feasible. Electric engines have been reported to have lower noise levels than internal combustion engines. • Temporary enclosures or acoustic barriers (i.e., solid sound absorber composite materials) will be used around stationary pieces of equipment. Noise barriers or enclosures will be selected with a sound transmission class of 30 or greater, in accordance with American Society of Testing and Materials Test Method E90. Acoustical curtain enclosures can provide a sound transmission loss of 10 to 13 dBA, whereas portable solid barriers can achieve up to 33 dBA in noise reduction.	CPUC monitor: Line item in monthly report	During construction	SCE and CPUC *Applicable to 66-kV subtransmission line and Telecommunications Routes #1, #2, #3, and #4 project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [a] and Consultation	Timing	Responsible Party and Project Component/s
	Acoustic barriers will be used for all construction activities within 100 feet of closest receptors. • Construction traffic will be routed away from residences and other sensitive receptors, as feasible. • Noise from back-up alarms (alarms that signal vehicle travel in reverse) in construction vehicles and equipment will be reduced by providing a layout of construction sites that minimizes the need for back-up alarms and using flagmen to minimize time needed to back up vehicles. As feasible, and in compliance with the applicant's safety practices and public and worker safety provisions required in the Occupational Safety and Health Standards for the Construction Industry (29 CFR Part 1926), the applicant may also use self-adjusting, manually adjustable, or broadband back-up alarms to reduce construction noise.			
	MM NS-2: Helicopter Use Notification Procedures. SCE will perform broad-based public outreach, using methods such as a combination of direct mail and media press releases, to provide project background and specific information concerning project construction helicopter use, including construction schedule, hours, duration, and location. At a minimum, SCE will include the City of Santa Clarita in this outreach, and will assist City staff as needed by providing or facilitating links from SCE web-based project information to an appropriate location on the City's website.	a. Record of helicopter use notification b. CPUC monitor: Line item in monthly report	a. Prior to and during construction b. Prior to and during construction	SCE and CPUC *Applicable to all SCE project components that require helicopter use
	MM NS-3: Operational Noise Control. After construction of the Central Compressor Station is completed, the applicant will take measures as necessary to ensure that the operational noise levels from the Central Compressor Station do not exceed 45 dBA at the closest receptor in the City of Los Angeles. Measures that may be implemented to achieve this level during the operational phase for turbines, compressors, and cooling equipment proposed to be installed at the Central Compressor Station could include: • Turbines will be placed within an acoustical enclosure;	a. Reports of operational noise surveys and any noise control measures required to be implemented b. CPUC monitor: Line item in monthly report	a. After construction (during initial startup and testing of Central Compressor Station) b. After construction (during initial startup and testing of Central	Applicant and CPUC *Applicable to the Central Compressor Station project component

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
	• Compressor noise will be mitigated by placing an acoustical blanket over the compressor itself or enclosing the compressor within an appropriately rated acoustical building; • Noise emitted from gas process coolers will be mitigated by installing acoustic barriers without gaps around the equipment casing and with a continuous minimum surface density of 10 kilograms per square meter in order to minimize the transmission of sound. In order to ensure that operational noise levels from the Central Compressor Station do not exceed 45 dBA at the closest receptor in the City of Los Angeles, the applicant will conduct noise surveys to measure noise levels at the location of the closest receptor in the City of Los Angeles (or a public location near this receptor and between the receptor and the storage facility site) during conditions when operations at the Central Compressor Station produce the highest noise levels (i.e., during time periods when gas injection are taking place at the maximum rate). Noise surveys will be conducted during initial start-up and testing of the Central Compressor Station, and as needed to confirm that plant operations and any required mitigation reduce operational noise to less than 45 dBA at the closest receptor in the City of Los Angeles.		Compressor Station)	
Impact NS-3: Permanent increase in ambient noise levels in the project vicinity.	**MM NS-3: Operational Noise Control.** See above.			
	MM NS-4: Install Polymer Insulators on 66-kV Subtransmission Line. SCE will install polymer (silicon rubber) insulators on the two lines proposed to be modified on the 66-kV subtransmission system.	CPUC monitor: Line item in monthly report	During construction	SCE and CPUC *Applicable to 66-kV subtransmission line project component
Impact NS-4: Substantial temporary or periodic increase	**MM NS-1: Noise Reduction and Control Practices.** See above.			
	MM NS-2: Helicopter Use Notification Procedures. See above.			

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [a] and Consultation	Timing	Responsible Party and Project Component/s
in ambient noise levels in the project vicinity.	**MM NS-3: Operational Noise Control.** See above.			
4.12 Population and Housing				
No applicable APMs or mitigation measures.				
4.13 Public Services and Utilities				
Impact PS-1: Result in substantial adverse physical impacts associated with new or physically altered governmental facilities.	**MM HZ-2: Construction Fire Control and Emergency Response Measures.** See above.			
	MM HZ-3: Fire Department Review and Coordination. See above.			
Impact PS-5: Served by a landfill without sufficient permitted capacity to accommodate the proposed project's solid waste disposal needs.	**APM HZ-5: Hazardous Materials Use and Storage and Hazardous Waste.** See above.			
	APM HZ-7: Wood Pole Recycling and Disposal. See above.			
	APM PS-2: Nonhazardous Waste Management. The applicant and SCE will ensure that nonhazardous waste materials, including wood, soil, vegetation, and sanitation waste (portable toilets) that would be generated during construction of the project components will either be re-used at the project component construction sites (e.g., clean soil used for backfill) or disposed of at an appropriately licensed offsite facility.	CPUC monitor: Line item in monthly report	During and after construction	Applicant, SCE, and CPUC *Applicable to all project components

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
Impact PS-6: Non-compliance with federal, state, or local statues and regulations related to solid waste.	**APM HZ-5: Hazardous Materials Use and Storage and Hazardous Waste.** See above.			
	APM PS-1: Site Cleanup. The applicant and SCE will direct construction contractors to perform initial site cleanup immediately following construction activities at each of the proposed project components. Initial site cleanup at each project component area will include the following: • Removal of all construction debris; • Proper disposal or recycling of all construction materials and debris at appropriately licensed landfills and other offsite facilities; and • Inspection of project component sites to ensure that cleanup activities are successfully completed.	a. Record of cleanup inspection (including photo documentation as needed) b. CPUC monitor: Line item in monthly report	a. Immediately after construction is completed at each project component construction site b. During and after construction	Applicant, SCE, and CPUC *Applicable to all project components
	APM PS-2: Nonhazardous Waste Management. See above.			
4.14 Recreation				
No applicable APMs or mitigation measures.				

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [(a)] and Consultation	Timing	Responsible Party and Project Component/s
4.15 Transportation and Traffic				
Impact TT-1: Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.	**APM TT-1: Traffic Control Plan.** The applicant and SCE will prepare Traffic Control Plans in accordance with the latest version of the California Joint Utility Traffic Control Manual. These Traffic Control Plans will be implemented by the applicant and SCE as needed. The Traffic Control Plans will be developed to minimize short-term construction-related impacts on local traffic and potential traffic safety hazards, and will include measures such as the installation of temporary warning signs at strategic locations near access locations for the project components. The signs will be removed after construction-related activities are completed. The Traffic Control Plans may include the following measures: • Coordination with the City of Los Angeles, City of Santa Clarita, County of Los Angeles, or County of Ventura on any temporary land or road closures; • Installation of traffic control devices as specified in the California Joint Utility Traffic Control Manual; • Provisions for temporary alternate routes to route local traffic around construction zones; and • Consultation with emergency service providers and development of an Emergency Access Plan for emergency vehicle access in and adjacent to the construction zone.	a. Traffic Control Plans b. Emergency Access Plans (as needed) c. Record of coordination with jurisdiction representatives and emergency services providers if such coordination is specified in the Traffic Control Plan d. CPUC monitor: Line item in monthly report	a. Prior to and during construction b. Prior to and during construction c. Prior to and during construction d. Prior to and during construction	Applicant, SCE, and CPUC *Applicable to all project components
	APM TT-3: Commuter Plan. The applicant would implement a Commuter Plan that includes a designated offsite parking area that has adequate parking capacity for 150 workers (the peak construction-activity maximum not including SCE workers) and a shuttle that would transport worker crews (approximately 10 workers per trip) from the parking area to worksites.	a. Commuter Plan b. CPUC monitor: Line item in monthly report	a. Prior to and during construction b. Prior to and during construction	Applicant and CPUC *Applicable to all project components constructed by the applicant

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [a] and Consultation	Timing	Responsible Party and Project Component/s
Impact TT-2: Conflict with an applicable congestion management program including, but not limited to, LOS standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.	**APM TT-1: Traffic Control Plan.** See above.			
	APM TT-3: Commuter Plan. See above.			
Impact TT-3: Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	**APM TT-1: Traffic Control Plan.** See above.			

Table 5. Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation [a] and Consultation	Timing	Responsible Party and Project Component/s
Impact TT-4: Result in inadequate emergency access.	**APM TT-1: Traffic Control Plan.** See above.			
	APM TT-3: Commuter Plan. See above.			
	MM TT-1: City of Santa Clarita Traffic Engineer Review. Prior to commencing work within Santa Clarita city boundaries, SCE will submit their Traffic Control Plan for the project to the City of Santa Clarita traffic engineer, and incorporate any recommendations from this review into the Traffic Control Plan.	a. Record of Traffic Control Plan review by City of Santa Clarita traffic engineer b. Record of Traffic Control Plan revisions as required after review by the City of Santa Clarita traffic engineer c. CPUC monitor: Line item in monthly report	a. Prior to construction b. Prior to construction c. Prior to and during construction	SCE and CPUC *Applicable to project components constructed by SCE within the City of Santa Clarita
Impact TT-5: Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.	**APM TT-1: Traffic Control Plan.** See above.			
	APM TT-2: Repair of Damaged Roads. The applicant and SCE will ensure that damage to existing roads that is the direct result of activities related to construction of the proposed project components will be repaired once construction is complete in accordance with local jurisdiction requirements and/or existing franchise agreements held by the applicant and SCE.	a. Record of roadway repair, including photo documentation showing roadways prior to and following construction b. CPUC monitor: Line item in monthly report	a. Within 3 months after construction b. After construction	Applicant, SCE, and CPUC *Applicable to all project components

Source: Ecology and Environment, Inc. 2014 and 2013, SoCalGas 2009–2012

Notes:

[a] All compliance documentation and consultation records to be available for CPUC staff review on request.

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ATTACHMENT A

Aliso Canyon Turbine Replacement Project Contacts

Name	Position	Email	Phone (Work)	Phone (Mobile)
First/Emergency Contacts:				
Southern California Gas:				
Seth Rosenberg	SoCalGas Environmental Coordinator	SRosenberg@semprautilities.com	(213) 244-2518	(213) 500-4568
Jim Strader	SoCalGas Project Manager	JStrader@semprautilities.com	(818) 700-3856	(213) 216-3850
Kevin Whalen	SoCalGas Construction/Safety Manager	KWhalen@semprautilities.com	(818) 725-1114	(805) 630-5984
Southern California Edison:				
Chris May	SCE Environmental/ Compliance Lead	Christina.May@sce.com	(626) 462-8647	(562) 884-4030
Dalton Cobb	SCE Project Manager	Dalton.Cobb@sce.com	(714) 255-4828	(626) 278-4975
CPUC/ E & E/ Ecotech:				
Andrew Barnsdale	CPUC Environmental Division Project Manager	andrew.barnsdale@cpuc.ca.gov	(415) 703-3221	
Lara Rachowicz	E & E Compliance Manager	LRachowicz@ene.com	(415) 398-5326 ext. 4730	(510) 459-9127
Claire Hodgkins	E & E Deputy Compliance Manager	CHodgkins@ene.com	(415) 398-5326 ext. 4714	(916) 396-1634
Secondary Contacts:				
Southern California Gas:				
David Buczkowski	SoCalGas Project Director	DBuczkowski@semprautilities.com	(213) 244-3630	(213) 598-1625
Larry Bittleston	SoCalGas Project Engineer	LBittleston@Semprautilities.com	(818) 701-3475	(818) 681-7422
Al Garcia	SoCalGas Senior Council	AGarcia6@semprautilities.com	(213) 244-2958	
Greg Healy	SoCalGas Regulatory Affairs	GHealy@semprautilities.com	(213) 244-3314	(626) 825-4225
Southern California Edison:				
Christine McLeod	SCE Regulatory Affairs	Christine.Mcleod@sce.com	(626) 302-3947	(626) 695-2787
CPUC/ E & E/ Ecotech:				
Vince Semonsen	E & E (Ecotech Resources) Compliance Monitor	vsemonsen@earthlink.net		(805) 452-8085
Caitlin Barns	E & E Biologist/Compliance Monitor	CBarns@ene.com	(415) 310-3168	(415) 310-3168
Other Contacts:				
CPUC/ E & E/ Ecotech:				
Tim Gross	E & E Archeologist	GGross@ene.com		(619) 252-2933

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ATTACHMENT B

Aliso Canyon Turbine Replacement Project
CPUC Site Inspection Form

Project:	Aliso Canyon Turbine Replacement	Date:	
Project Proponent:	Southern California Gas Company and Southern California Edison	Report #:	
Lead Agency:	California Public Utilities Commission	Monitor(s):	
CPUC PM:	Andrew Barnsdale, Energy Division	AM/PM Weather:	
E & E CM:	Lara Rachowicz	Start/End time:	
Project NTP(s):			

SITE INSPECTION CHECKLIST

WEATP Training	Yes	No	N/A
Has WEATP training been completed by all new hires (construction and monitors)?			
Erosion and Dust Control (Air and Water Quality)			
Have temporary erosion and sediment control measures been installed?			
Are erosion and sediment control measures properly installed and functioning?			
Is mud tracked onto paved public roadways cleaned up in accordance with the project's SWPPP?			
Is dust control being implemented (i.e., access roads watered, haul trucks covered, streets cleaned on a regular basis)?			
Are work areas being effectively watered prior to excavation or grading?			
Is excessive fugitive dust leaving the work area?			
Equipment			
Are all vehicles observed maintaining a speed limit of 15 mph on unpaved roads?			
Are all vehicles/equipment observed arriving onsite clean of sediment or plant debris?			
Are vehicles/equipment turned off when not in use?			
Work Areas			
Is vegetation disturbance within work areas minimized?			
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?			

Are vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?			
Are all excavations and trenches covered at the end of the day?			
Are ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?			
Biology			
Have preconstruction surveys been completed for biological (wildlife, nesting birds, gnatcatcher, least Bell's vireo) resources as appropriate?			
Are biological monitors present onsite?			
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?			
Have wildlife been relocated from work areas?			
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?			
Did you observe any threatened or endangered species? List:			
Are there wetlands or water bodies present near construction activities?			
Have there been any work stoppages for biological resources?			
Cultural and Paleontological Resources			
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?			
Are archaeological and paleontological monitors onsite if needed?			
Are appropriate buffers maintained around sensitive resources (e.g. cultural sites)?			
Have there been any work stoppages for cultural/paleo resources?			
Hazardous Materials			
Are hazardous materials stored appropriately?			
Are procedures in place to prevent spills and accidental releases?			
Are appropriate fire prevention and control measures in place?			
Is contaminated soil properly handled or disposed of, if applicable?			
Work Hours and Noise			
Are night lighting reduction measures in place, as needed?			
Is construction occurring within approved hours (7am-5pm, M-F)?			
Are noise control measures in place within 100 feet of sensitive receptors as needed?			

AREAS MONITORED (i.e., structure numbers, yards, or substations)
DESCRIPTION OF OBSERVED ACTIVITIES (i.e., mitigation measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews)
MITIGATION MEASURES VERIFIED (Refer to MMCRP, e.g., MM BR-5. Report only on MMs pertinent to your observations today)
RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)
COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on-site, environmental observations of note)

COMPLIANCE SUMMARY

Below please describe any non-compliance issues or new biological/cultural discoveries (compliance level 0) that have occurred since your last visit. If you observe a non-compliance issue in the field, please note this on the monitoring datasheet, and for non-compliance Level 2 or 3 fill out and submit a separate Non-Compliance Report Form to E & E Compliance Manager. Inform E & E CM of any non-compliance incidents.

☐ Compliance Level 0: New biological or cultural discovery requiring compliance with mitigation measures, permit conditions, etc. If checked, please describe discovery and documentation/verification below.

☐ Non-compliance – Level 1: Violates the project's environmental requirements but does not immediately put environmental resources at risk. Applicant will need to correct the action and/or prevent repeat incidents of the same issue. If you checked this box, describe the incident below and follow-up to ensure correction.

☐ Non-Compliance Level 2: (Minor Incident) Level 2 should be those actions that have the potential to cause or cause immediate, minor risk to environmental resources such as activities that result in a deviation from the mitigation measure requirements that result in minor, short-term impact to resources. A non-compliance Level 2 situation may occur when Level 1 incidents are repeated, and show a trend toward placing resources at unnecessary risk. If you checked this box, please fill out a Non-Compliance Report.

☐ Non-Compliance Level 3: (Major Incident) Level 3 are those actions that have the potential to cause or cause immediate, major risk to environmental resources such as: major environmental incident that is not in compliance with the applicant mitigation measures, mitigation measures, permit condition, approval (e.g., variances, addendums) requirements, and/or environmental construction specifications; violation of the law; or documented repetitive occurrences of Level 2 Minor Incident events. If you checked this box, please fill out a Non-Compliance Report.

☐ Non-compliance issues reported by SoCalGas or SCE: Were there any new non-compliance issues reported by SoCalGas or SCE monitors since your last visit? If so, describe issues and resolution and include SoCalGas or SCE report identification number.

Date	Non-compliance issue and resolution	Relevant Mitigation Measure	NC Report #

PREVIOUS NON-COMPLIANCE ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description

Completed by:	
Firm:	
Date:	

Reviewed by:	
Firm:	
Date:	

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ATTACHMENT C

Aliso Canyon Turbine Replacement Project
Construction Non-Compliance Report

Incident Date:		**Report No.:**	
Date Submitted:		**Location:**	
Level:		**Relevant Plan/Measure:**	
Current Land Use:		**Sensitive Resources:**	

Description of Incident:
Pertinent Plans/Permits/Mitigation Measures:
Proposed Resolution:
Recommended timeline for follow-up:

Approvals	Date	Name (print)	Signature	Comments
CPUC Compliance Manager				
CPUC Compliance Monitor (if applicable)				
CPUC Project Manager (if applicable)				
SoCalGas/SCE Environmental Compliance Manager (if applicable				

Prepared by: _____ **Date:** _____

Non-compliance Level	Description	Example
Level 1 (Clarification/ Correction Required) Level 1 should only apply to those actions that do not cause immediate risk to environmental resources.	Activities that result in a partial implementation of the mitigation measures and require minor clarification of mitigation measures requirements	i. Initial inadvertent failure to implement adequate dust control measures resulting in no impact on resources; ii. Minor inadvertent hazardous material/fuel release resulting in no impact on resources; iii. Improperly installed, repaired, or maintained erosion or sediment control devices (with no resultant harm to sensitive resources or release of sediment to waters); iv. Inadvertent minor incursion into exclusion area resulting in no harm to sensitive biological or cultural resources; v. Use of an existing unapproved access road (first offense); vi. Work outside the approved work limits where the incident is within a previously disturbed area, such as a gravel lot
Level 2 (Minor Incident) Level 2 should apply to those actions that have the potential to cause or cause immediate, minor risk to environmental resources.	Activities that result in a deviation from the mitigation measure requirements that result in minor, short-term impacts to resources	i. Work without appropriate permit(s); ii. Failure to properly maintain an erosion or sediment control structure, but the structure remains functional, and results in minor impacts on resources (e.g. water courses); iii. Brush clearing outside the approved work limits with no impacts on sensitive resources; iv. Repeated documentation of Level 1 incidents
Level 3 (Major Incident) Level 3 should apply to those actions that have the potential to cause or cause immediate, major risk to environmental resources.	Major environmental incident that is not in compliance with the applicant mitigation measures, mitigation measures, permit condition, approval (e.g., variances, addendums) requirements, and/or environmental construction specifications; violation of the law; or documented repetitive occurrences of Level 2 (Minor Incident) events	i. Construction activities occurring in an exclusion zone with direct impacts to sensitive or endangered species, cultural resources, human remains, or an archaeological site; ii. Eminent danger or documented impact to a sensitive or T&E species; iii. Repeated deviations from required mitigation measures/requirements that have been documented as Level 2 (Minor Incidents); iv. Improper installation of erosion or sediment control structures resulting in substantial sedimentation or impacts to water quality or putting sensitive resources at risk; v. Grading, foundation, or line work without required biological preconstruction surveys or a biological monitor on site; vi. Use of new access roads, staging areas, or extra workspaces not identified on the project drawings or approved for use during construction.

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ATTACHMENT D

Aliso Canyon Turbine Replacement Project
CPUC Minor Project Refinement Form
[with instructions]

Date Requested: [date that form is submitted to CPUC Compliance Manager]

Report No.: [CPUC Compliance Manager fills in]

Date Approved: [date CPUC Compliance Manager sends the approved form back to applicant]

Approval Agency: [consider whether another agency or municipality must approve the requested change]

Property Owner(s):

Location/Milepost:

Land Use/Vegetative Cover:

Sensitive Resources: [Any resource that could be affected, directly or indirectly, by this action even if mitigation measures will reduce these impacts to less than significant]

Modification From: ☐ **Permit** ☐ **Plan/Procedure** ☐ **Specification** ☐ **Drawing**

☐ **Mitigation Measure** ☐ **Other:**

[What document contained the official workplan, construction description, mitigation measure or engineering drawing for this project component or activity? Include this document title in the description below. Consider whether this change differs from that description].

Describe how project refinement deviates from current project. Include photos.

What to include in this section:

- Original Condition: A concise description of the existing condition as it is originally described and approved (NTP, engineering specifications, FEIR, etc.) – i.e., how did the applicant originally intend to build this/do this?
- Justification for change: A concise description of and justification for the change requested – i.e., what happened to make the change necessary?
    - These descriptions should be detailed enough and include enough background so that a person unfamiliar with the project should be able to follow the narrative about what the original plan was and why the new plan is needed instead.
    - The description should be in layman's terms to the extent possible. Be as specific as possible. The more vague the language, the more conditions may need to be added to account for omissions. Avoid logic leaps.
- Maps & Figures: The exact location(s)/project component(s) the change will affect. Include dimensions, if applicable. A map and/or figure is usually extremely helpful. Make sure the map is at a readable scale. Ideally, the map should be based on the most current project map and show other project components, survey areas, underlying topography, etc.
- Environmental Impact: Demonstrate that the applicant has considered how this change will affect environmental/cultural resources. List MMs, plans, permits, etc. that were reviewed in order to ensure that this change will not result in significant impacts.
    - Include analyses demonstrating that projected impacts will not be significant (e.g., narrative justification, tables, figures, calculations, etc.). Base this analysis on what was previously analyzed in the NTP, FEIR, etc.
- Concurrence: Demonstrate that the applicant has considered whether other agencies, municipalities, utilities, etc. would need to provide concurrence with this MPM. If so, either provide anticipated contact/approval schedule, or provide dates/contact reports/emails with approvals.

Resources:

Biological ☐ No Resources Present ☐ Resources Present ☐ N/A

Previous Biological Survey Report Reference: [Include dates of original "baseline" surveys (from EIR analysis) to prove that the areas/practices were previously analyzed. Include more recent preconstruction sweeps, if applicable, to prove that the applicant has an understanding of what resources are currently present in this new area or could be impacted by this new practice.]

Cultural ☐ No Resources Present ☐ Resources Present ☐ Within Project Component Area

☐ N/A (paved/graveled area or no ground disturbance)

Previous Cultural Survey Report Reference:

Disturbance Acreage Changes: ☐ Yes ☐ No

Original disturbance acreage: New disturbance acreage:

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Geology, Soils, and Seismicity	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	[Add notes to specify whether agency consultation is necessary, and if so, provide brief summary of that consultation.]
Hazardous Materials and Waste	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	
Hydrology	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	
Cultural Resources	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	
Traffic and Circulation	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	
Air Quality	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	
Noise and Vibration	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	
Visual Resources	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	
Vegetation and Wildlife	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	

Approvals	Date	Name (print)	Signature	
Southern California Gas Environmental Coordinator and/or Southern California Edison Environmental Coordinator				☐ Reviewed
CPUC Project Manager				☐ Approved ☐ Approved with conditions (see below) ☐ Denied

For CPUC Compliance Manager Use Only		
☐ **Refinement Approved**	☐ **Refinement Denied**	☐ **Beyond Authority**

Conditions of Approval or Reason for Denial:

Prepared by: **Date:**

Minor Project Refinement Definitions

Project refinements are strictly limited to minor changes that will not trigger less restrictive or new discretionary permit requirements, that do not increase or create impacts, and that comply with the mitigation measures.

Project Change Level	Description	Example
Level 1 (Minor Change)	Temporary actions that will not affect biological or cultural resources or deviate from APMs, MMs, or permit requirements; use of existing private resources (i.e., private road, well) with permission	Temporary use of an existing access road, storage yard, well, hydrant, etc. not associated with current project
Level 2 (Major Change)	Changes to established mitigation protocols or project activities due to new information or improved techniques that result in temporary, insignificant impacts on resources	Installing additional disposal sites; road widening or additional grading; changes to seed mix for restoration if does not significantly alter final targeted vegetation composition
Petition for Modification	Significant, long-term changes to construction plan or mitigation protocol that require additional biological or cultural surveys or verification; discovery of omissions or errors in project documents (permits, MMs, APMs) that jeopardize biological or cultural resources; discovery of new and significant biological or cultural resources that require new avoidance measures	Construction of a new access road or bridge; discovery of new sensitive species or habitat not initially described in project documents; changes to seed mix for restoration that significantly alter final targeted vegetation composition

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