

# Mitigation Monitoring, Compliance, and Reporting Program

## COMPLIANCE PLAN

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### Santa Barbara County Reliability Project

Version 1

January 2016



Prepared by Ecology and Environment, Inc. for:

State of California  
Public Utilities Commission

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## Acronyms and Abbreviations

|         |  |
|---------|--|
| APCD    | Air Pollution Control District                           |
| APM     | applicant proposed measures                              |
| AQMD    | Air Quality Management District                          |
| BMP     | Best Management Practices                                |
| CDFW    | California Department of Fish and Wildlife               |
| CEQA    | California Environmental Quality Act                     |
| CM      | Compliance Manager                                       |
| CPUC    | California Public Utilities Commission                   |
| CRHR    | California Register of Historical Resources              |
| DCM     | Deputy Compliance Manager                                |
| E & E   | Ecology & Environment, Inc.                              |
| EC      | Environmental Coordinator                                |
| EIR     | Environmental Impact Report                              |
| ESHA    | environmentally sensitive habitat area                   |
| kV      | kilovolt   |
| MBTA    | Migratory Bird Treaty Act                                |
| MM      | mitigation measure                                       |
| MMCRP   | Mitigation Monitoring, Compliance, and Reporting Program |
| NMFS    | National Marine Fisheries Service                        |
| NTP     | Notice to Proceed  |
| O&M     | Operations and Maintenance                               |
| PFM     | Petition for Modification                                |
| PM      | Project Manager  |
| POC     | Point of contact   |
| project | Santa Barbara County Reliability Project                 |
| ROW     | Right-of-ways  |
| RWQCB   | Regional Water Quality Control Board                     |
| SCE     | Southern California Edison                               |
| SQAQMD  | Southern California Air Quality Management District      |
| SWPPP   | Stormwater Pollution Prevention Plan                     |
| USACE   | U.S. Army Corp of Engineers                              |
| USFS    | U.S. Forest Service                                      |
| USFWS   | U.S. Fish and Wildlife Service                           |

## 1.0 Overview and Purpose

The California Public Utilities Commission (CPUC) approved a Permit to Construct for the Santa Barbara County Reliability Project on November 5, 2015. As part of this action, the CPUC certified the Final Environmental Impact Report (EIR) for the project and adopted the Mitigation Monitoring Plan (MMP) presented in the Final EIR. This Mitigation Monitoring Compliance and Reporting Program (MMCRP), referred to here as the Compliance Plan, is based on the Final EIR's MMP and serves as a working guide to maintaining environmental compliance for the project. The Compliance Plan also includes information provided in the Final EIR 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 Edison (SCE) has 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 SCE is not fully implementing each applicable APM and mitigation measure), the monitor will issue a warning to the construction supervisor and SCE's 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 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 SCE's compliance with project conditions is checked on a regular basis. Reporting, which comprises written reviews of 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 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 reliability to SCE's Santa Barbara County South Coast area. The area is primarily served by the Goleta-Santa Clara No. 1 220-kilovolt (kV) Transmission Line and Goleta-Santa Clara No. 2 220 kV Transmission Line. The backup source for these transmission lines are three 66-kV subtransmission systems. The project would reinforce two of the three 66-kV subtransmission lines. In the event that one of the 220-kV Transmission Lines would be out of service the existing 66-kV subtransmission lines would not provide safe and reliable service to the area.

### 1.2.1 Construction

#### Components

SCE proposes to construct the project between the City of Ventura, in Ventura County, and the City of Carpinteria, in Santa Barbara County. The proposed project comprises the following:

- Removal and/or replacement of existing 66-kilovolt (kV) subtransmission structures facilities, primarily within existing utility rights-of-way (ROWs) between the existing Santa Clara Substation in Ventura County and the existing Carpinteria Substation in Santa Barbara County.
- Installation of marker balls on overhead wire where determined necessary.
- Modification of subtransmission and substation equipment within the existing Carpinteria Substation, Casitas Substation, and Santa Clara Substation.
- Replacement of line protection relays within existing substation equipment rooms or cabinets at the Getty Substation, Goleta Substation, Ortega Substation, and Santa Barbara Substation.
- Installation of telecommunications facilities to connect the proposed project to the applicant's existing telecommunications system for the protection, monitoring, and control of subtransmission and substation equipment.
- Installation of new telecommunications facilities along reconstructed subtransmission segments and at the Carpinteria Substation, Casitas Substation, Santa Clara Substation, and Ventura Substation.
- Transfer of distribution lines (and third-party infrastructure as necessary) to new subtransmission structures.
- Removal of subtransmission infrastructure, such as tower foundation footings, decommissioned during previous 66-kV reconstruction activities between 1999 and 2004.

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

**Table 1. Project Construction Activities**

| Project Component/Construction Activities   | Duration (months) | Number of Workers During Peak Period | Anticipated Start Date |
|---|-------------------|--------------------------------------|------------------------|
| Establish Staging Areas outside Coastal Zone  | 3                 | 8                                    | 3/16                   |
| Segments 1 and 2: Remove existing foundations, retrofit existing TSPs and LSTs, install OPGW, perform Getty Tap work  | 5                 | 24                                   | 4/16                   |
| Segments 3B and 4, outside Coastal Zone: Install TSPs, install conductor and OPGW, remove existing structures and conductor, rehabilitate existing/develop new access roads   | 9                 | 93                                   | 6/16                   |
| Segment 4, inside Coastal Zone: Install TSPs, install conductor and OPGW, remove existing structures and conductor, rehabilitate existing/develop new access roads  | 10                | 93                                   | 12/16                  |
| Segment 3A: Install FRC, remove topped wood poles, transfer distribution and telecommunications lines   | 5                 | 30                                   | 2/17                   |
| Santa Clara, Casitas, Carpinteria Substations: Modify subtransmission switchracks, install/remove structures and poles, install conductor, upgrade line protection equipment<br>Getty, Goleta, Ortega, Santa Barbara Substations: Upgrade line protection equipment | 10                | 24                                   | 9/16                   |
| Segment 5: Remove existing structures and conductor   | 6                 | 8                                    | 3/17                   |
| <b>Total</b>  |                   | <b>NTE 105 per day</b>               |                        |

For a complete description of the project, see Chapter 2, Project Description, of the Final EIR (May 19 2015).

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, SCE is 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 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 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 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;
- 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. 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 SCE via email;
5. As needed, 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 SCE.

Construction will commence in March 2016 and is anticipated to take approximately 24 months to complete, including time for inspection, testing, and decommissioning. SCE's targeted operation startup date is 2017. A conceptual project construction phasing schedule is provided in Table 2.

Table 2. Conceptual Project Construction Schedule

|                               | 2016 |   |   |   |   |   |   |   |   |   |   |   | 2017 |   |   |   |   |   |   |   |   |   |   |   | 2018 |   |   |   |   |   |   |   |   |   |   |   |
|-------------------------------|------|---|---|---|---|---|---|---|---|---|---|---|------|---|---|---|---|---|---|---|---|---|---|---|------|---|---|---|---|---|---|---|---|---|---|---|
|                               | J    | F | M | A | M | J | J | A | S | O | N | D | J    | F | M | A | M | J | J | A | S | O | N | D | J    | F | M | A | M | J | J | A | S | O | N | D |
| Laydown Yards                 |      |   | ■ | ■ | ■ |   |   |   |   |   |   |   |      |   |   |   |   |   |   |   |   |   |   |   |      |   |   |   |   |   |   |   |   |   |   |   |
| OPGW Work on Segments 1 & 2   |      |   |   | ■ | ■ | ■ | ■ | ■ |   |   |   |   |      |   |   |   |   |   |   |   |   |   |   |   |      |   |   |   |   |   |   |   |   |   |   |   |
| 66kV Line Work - Non CDP      |      |   |   |   |   | ■ | ■ | ■ | ■ | ■ | ■ | ■ |      |   |   |   |   |   |   |   |   |   |   |   |      |   |   |   |   |   |   |   |   |   |   |   |
| 66kV Line Work - Coastal Zone |      |   |   |   |   |   |   |   |   |   | ■ | ■ | ■    | ■ | ■ | ■ | ■ | ■ | ■ | ■ | ■ |   |   |   |      |   |   |   |   |   |   |   |   |   |   |   |
| FRC Wire Installation         |      |   |   |   |   |   |   |   |   |   |   |   | ■    | ■ | ■ | ■ | ■ | ■ | ■ | ■ | ■ |   |   |   |      |   |   |   |   |   |   |   |   |   |   |   |
| Substation                    |      |   |   |   |   |   |   |   |   | ■ | ■ |   |      |   |   |   |   |   |   |   |   | ■ | ■ | ■ | ■    | ■ | ■ | ■ | ■ | ■ | ■ | ■ | ■ | ■ | ■ | ■ |
| Segment 5                     |      |   |   |   |   |   |   |   |   |   |   |   |      |   |   |   |   |   |   |   |   |   |   |   |      |   |   |   |   |   |   |   |   |   |   |   |

\*Anticipated start date March 2016.

### 1.2.3 Project Compliance Requirements

Per the adopted APMs and mitigation measures, SCE is 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 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. Santa Barbara County Reliability Project: Plans, Reports, and Other Documentation Required for Compliance Verification**

| Item   | MM or APM  | Responsible Action Agency  |
|--|--|--|
| Surface Treatment Plan   | MM AE-4  | CPUC   |
| Construction equipment: Tier 3 and Tier 4 off road emission annual report  | MM AQ-1  | CPUC   |
| Nesting Bird Management Plan   | APM BIO 4,<br>MM BIO-10                          | CPUC, USFWS, CDFW  |
| Storm Water Pollution Protection Plan  | APB BIO-7  | CPUC, RWQCB  |
| Noxious and Invasive Weed Control Plan   | MM BIO-3   | CPUC, CDFW, Santa Barbara and Ventura Counties                     |
| Habitat Restoration and Mitigation Plan  | MM BIO-5   | CPUC, NMFS, CDFW, USFWS, Santa Barbara and Ventura Counties        |
| Jurisdictional Delineation   | MM BIO-8   | CPUC, CDFW, NMFS, USFWS, USACE, Santa Barbara and Ventura Counties |
| Hydrologic Features and Mitigation Monitoring Plan   | MM BIO-8   | CPUC, CDFW, NMFS, USFWS, USACE, Santa Barbara and Ventura Counties |
| Burrowing Owl Compensation Plan (if burrowing owls are observed)   | MM BIO-11  | CPUC, CDFW   |
| WEAP training: dust control, biological resources, cultural and paleontological resources, SWPPP, spill protection | APM GEN-1,<br>MM BIO-9, MM CR-15                 | CPUC   |
| Notification and report of discovery of human remains  | APM CUL-1  | CPUC, County Coroner   |
| Cultural Resources Plan<br>If discoveries:<br>1. Testing and Evaluation Plan<br>2. Data Recovery Plan              | APM CUL-1,<br>MM CR-1, MM CR-3, MM CR-8, MM CR-9 | CPUC   |
| Native American Consultation and Participation Plan  | MM CR-5  | CPUC   |

**Table 3. Santa Barbara County Reliability Project: Plans, Reports, and Other Documentation Required for Compliance Verification**

| Item   | MM or APM                     | Responsible Action Agency   |
|--|-------------------------------|---|
| Paleontological Monitoring and Treatment Plan                    | MM CR-11, MM CR-14, APM CUL-2 | CPUC  |
| Slope Stability annual report                                    | MM GEO-1                      | CPUC  |
| Contaminated Soil/Ground water Contingency Plan                  | MM HZ-1                       | CPUC  |
| Fire Control and Emergency Response Plan                         | MM HZ-2                       | CPUC, CALFIRE, USFS, Santa Barbara County Fire Department, Ventura County Fire Protection District, Carpinteria-Summerland Fire Protection District |
| Noise Control Plan   | MM NV-1                       | CPUC  |
| Water Efficiency Plan  | MM PS-1                       | CPUC, SWRCB   |
| Solid Waste Management Plan                                      | MM PS-2                       | CPUC, Santa Barbara and Ventura Counties  |
| Notification of Trail Closures                                   | MM RE-1                       | CPUC, City of Carpinteria Parks and Rec Department, County of Ventura Parks Department  |
| Traffic Control Plan   | MM TT-1                       | CPUC, City of Carpinteria, Carpinteria-Summerland Fire District, City of Ventura, County of Santa Barbara, County of Ventura                        |
| Helicopter Safety Plan and External Load Training; WEAP training | MM TT-2                       | CPUC  |
| Notification and Monitoring of Helicopter Use                    | MM TT-3                       | CPUC, Van Nuys Flight Standards District  |
| Repair of Damaged Trails   | MM TT-4                       | CPUC  |

Key:

APM = Applicant Proposed Measures  
CDFW = California Department of Fish and Wildlife  
CPUC = California Public Utilities Commission  
FAA = Federal Aviation Administration  
MM = Mitigation Measure  
NMFS = National Marine Fisheries Service

RWQCB = Regional Water Quality Control Board  
SWRCB = State Water Resources Control Board  
USACE = U.S. Army Corps of Engineers  
USFS = U.S. Forest Service  
USFWS = U.S. Fish and Wildlife Services  
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], the County of Santa Barbara [with respect to Coastal Zone compliance issues], National Marine Fisheries Service [NMFS], the U.S. Army Corps of Engineers [USACE], and Air Quality

Management Districts [AQMDs]) may periodically visit the site or request information regarding the status of mitigation implementation. SCE is 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 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

SCE, 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.

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

PM: Project Manager (applies to SCE and Energy Division)

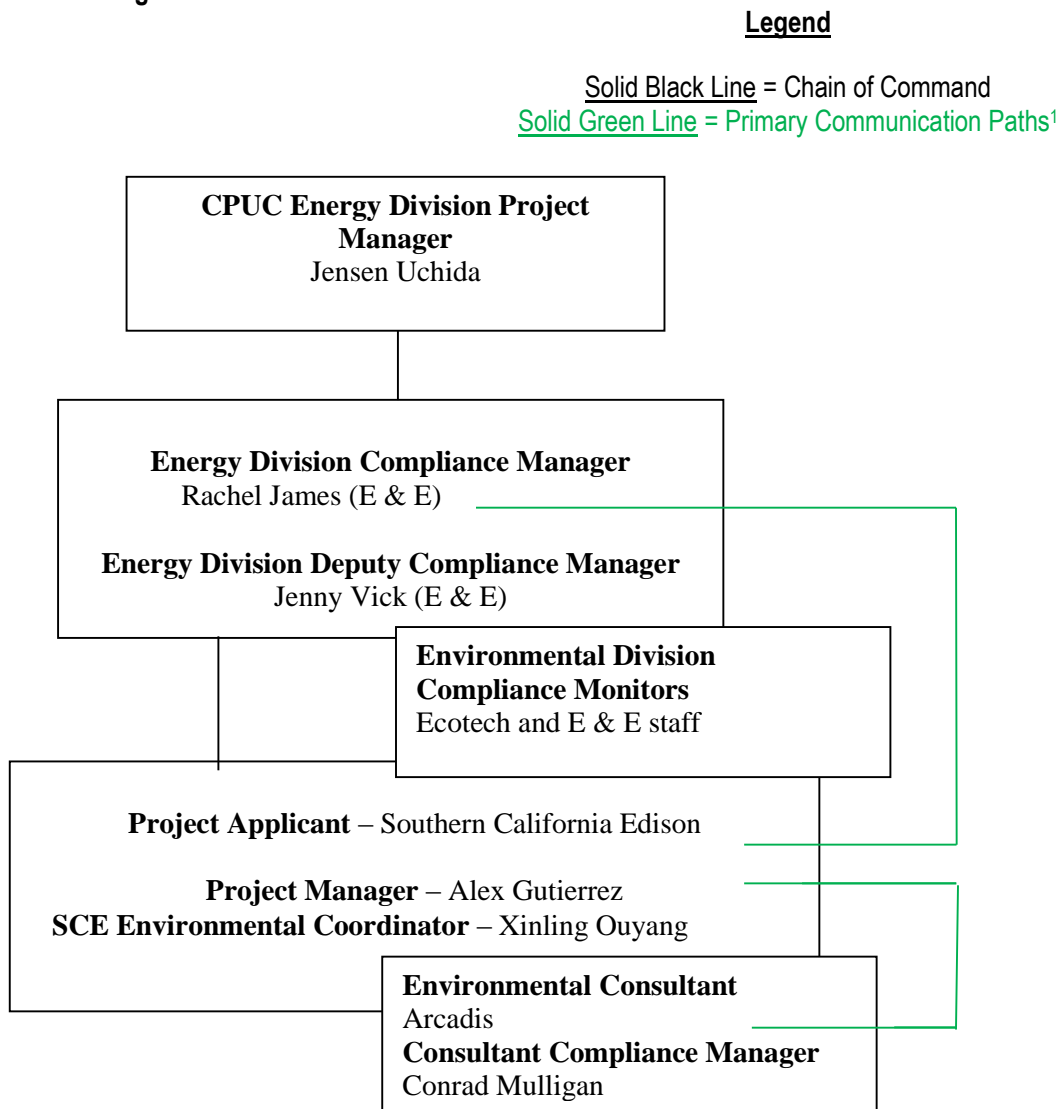
EC: Environmental Coordinator (applies to SCE)

CM: Compliance Manager (applies to SCE and Energy Division)

#### 2.1.1 SCE Project Manager

**Role and Responsibility.** SCE's PM, Alex Gutierrez, is part of SCE's Major Projects Organization and will provide the overall direction, management, leadership, and corporate coordination for the project. Mr. Gutierrez 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. Gutierrez will lead environmental compliance throughout the duration of construction for the project.

Figure 1. Organizational Chart



<sup>1</sup> 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 SCE PM's responsibilities include, but are not limited to:

- Leading coordination among engineering, construction management, and environmental staff for SCE;
- Leading coordination between SCE staff 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 SCE PM reports to upper management within SCE's Major Projects Organization. The SCE PM gives direction to the SCE Environmental Coordinator (EC), whose role is described below.

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

### 2.1.2 SCE Environmental Coordinator

**Role and Responsibility.** SCE's Environmental Coordinator (EC), Ms. Xinling Ouyang, is responsible for providing the appropriate level of resources for successful environmental compliance. The SCE 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. Ms. Ouyang will be assisted by SCE's environmental consultant, Arcadis, and Arcadis's CM, Conrad Mulligan. The SCE EC is ultimately responsible for ensuring that SCE construction crews maintain compliance with all project permits, APMs, and mitigation measures. The SCE EC is the primary compliance POC for SCE.

**Reporting Relationship.** The SCE EC reports to the SCE PM and directs the work of SCE subject matter experts and the Arcadis CM.

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

### 2.1.3 SCE Environmental Monitoring Team

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 team for SCE will be led by SCE's environmental consultant's CM under the direct

supervision of SCE's EC. The CM will coordinate the activities of their environmental monitoring team, 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 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 SCE as needed and as required to protect sensitive biological, paleontological, and archaeological resources.

In addition to ensuring compliance during construction, SCE is 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. The environmental consultant CM will provide drafts of the status updates to the EC who will review and approve the status updates before being submitted to the Energy Division CM and PM.

#### **2.1.4 Energy Division Project Manager**

The Energy Division PM, Mr. Jensen Uchida, will determine the effectiveness of compliance with environmental requirements based on the success criteria included for each APM and mitigation measure. Mr. Uchida 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. Uchida 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. Uchida for review and approval.

#### **2.1.5 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. Rachel James 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. Jenny Vick, 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.

#### **2.1.6 Construction Supervisor**

A construction supervisor will be identified for SCE prior to the start of construction. The construction supervisor 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 supervisor will also ensure that construction schedules are provided to SCE's EC 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 supervisor will also report any deviations from compliance and spills (e.g., fuel or water) to the SCE Compliance Monitor.

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

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

### **2.1.7 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 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**

SCE is 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 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).<sup>2</sup> 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

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<sup>2</sup> <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M065/K136/65136746.PDF>

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;
- 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.

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 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 BIO 1, APM BIO 3, APM BIO-5, APM BIO-6, MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-9, MM BIO-10, MM BIO-11, MM BIO-12, MM BIO-13 |
| Biologist: avian   | APM BIO-4, MM BIO-10   |
| Arborist           | MM BIO-4   |
| Botanist           | APM BIO-2  |
| Archeologist       | APM CUL-1, APM CUL-3, MM CR-1, MM CR- 3, MM CR-4, MM CR-5, MM CR-6, MM CR-7, MM CR-8   |
| Paleontologist     | APM CUL-2, MM CR-11, MM CR-12, MM CR-13, MM CR-14  |

## 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 SCE's approach in conducting these required surveys and any additional clearance sweeps.

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, Noxious and Invasive Weed Control Plan, Special Status Plant Survey, and Burrowing Owl Protocol Survey.

Additional surveys are required within a specific time frame based on the onset of construction. The preconstruction surveys required by APM BIO-1 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, preconstruction surveys are required as impact reduction measures for several specific wildlife species: red-legged frog (MM BIO-9), burrowing owl (MM BIO-11), Southwestern willow flycatcher and least Bell's vireo (MM BIO-12), and ringtail and American Badger (MM BIO-13).

Preconstruction surveys for special status plant and wildlife species are required as clearance sweeps the day before or any day of construction required by MM BIO-2. These would include all access, laydown/work, and staging areas where suitable habitat is present, including all tower installation sites, existing and proposed access roads, staging areas, and tower footing removal sites. The duration and spatial extent to which clearance surveys need to be conducted will be at the discretion of the lead 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 Cultural Resources 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 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 SCE and Energy Division management and environmental compliance teams must be present. Representatives from 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, SCE PMs; the Energy Division CM and DCM; SCE EC; Energy Division Compliance Monitors, and representatives from SCE 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 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 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 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 SCE. The purpose of the stand-down would be to give 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 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 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 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 SCE's EC. An Energy Division Compliance Monitor will contact 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 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 SCE's EC. The Energy Division Compliance Monitor will not provide work direction to the contractor or SCE's environmental monitors, and will avoid directing questions to the construction crews.

### **2.3.3 SCE's Environmental Compliance Report**

As discussed in Section 2.1.3, SCE will provide a Weekly Status Update to the Energy Division CM and PM, which will include construction schedules for the upcoming week. The environmental consultant CM

will provide drafts of the status updates to their EC who will review and approve the status updates before being submitted to the Energy Division CM and PM.

In addition, SCE will prepare and distribute a monthly environmental compliance report 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. SCE is 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.

**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, or special status plants.

**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. 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.

**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.

**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 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 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 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 SCE. For both self-reports and discoveries, the Energy Division CM may ask 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. 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 and 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 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 SCE EC 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 SCE's EC. 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 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 SCE.
- If an incident is self-reported by SCE, the same procedure listed above (see Section 3.1.3) should be followed, depending on the incident's severity. 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 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 SCE staff concerning the cause and potential resolution of the issue. The CM will direct 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 SCE'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, 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 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

This section describes the CPUC’s process for staff approval of minor project refinements (refinements) that may be necessary due to changes resulting after the applicant’s final engineering of project elements. Approval of minor project refinements would only be granted by the CPUC if the refinements achieve or exceed the level of environmental protection approved in the project CEQA document, are consistent with CEQA requirements, and comply with the intent of the mitigation measures in the CEQA document. Requests for project modifications that do not fall within the authority delegated to staff must be sought by a Petition for Modification.

### 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;<sup>3</sup>
- 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 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 SCE, including plans, permits, reports, and staff qualifications as required by APMs and mitigation measures, will be maintained by 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 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.

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<sup>3</sup> 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.

## 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, dated September 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

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)   | Monitoring Requirements                          | Timing                           |
|--|--|--|----------------------------------|
| <b>4.1 Aesthetics</b>  |  |  |                                  |
| <p><i>Impact AE-2: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.</i></p> | <p><b>MM AE-2: Construction Site Upkeep.</b> The applicant will keep all construction sites clean and orderly and will ensure that building materials and equipment are as inconspicuous as possible (e.g., screened or stored away from public view).</p>   | <p>Verify cleanliness of construction sites.</p> | <p>During construction.</p>      |
|  | <p><b>MM AE-3: Reduce Aesthetic Impacts of Retaining Walls and Access Road Improvements.</b> For all retaining walls, other mechanically stabilized embankments (MSEs), and access road improvements (e.g., cut and fill slopes) visible from residences, public use or recreation areas, or publicly accessible state and county roads, aesthetic impacts will be reduced through application of techniques that minimize contrast with colors, forms, and textures within the surrounding landscape setting. Visible portions of concrete crib walls, other MSEs, and cut and fill slopes with exposed soil and/or rock will use finish colors and/or surface applications that help substantially blend these structures with their surroundings. Surface applications to reduce contrast may include non-toxic, long-lasting darkening agents; other non-toxic color contrast reduction agents; rock applications; and/or naturalistic surface patterning. Native vegetation will be planted in locations in close proximity to concrete crib walls, other MSEs, and cut and fill slope that will help screen these elements from public views and blend them with their surroundings.</p> | <p>Verify minimization of contrast.</p>          | <p>During post-construction.</p> |

| Impact  | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements   | Timing                    |
|---|--|---|---------------------------|
|   | <p><b>MM AE-4: Glare and Color Contrast Reduction for Transmission Structures and Conductors.</b> To reduce potential glare and color contrast for components of the proposed project, the finish on all new transmission structures will be non-reflective, such as steel that has been galvanized and treated to create a dulled finish, to reduce light reflection and color contrast and help blend the structures into the landscape setting. All new transmission conductors will be non-specular to minimize conductor reflectivity and help blend them into the landscape setting. J-Tower structures will have a non-reflective, dull-galvanized steel, self-weathering steel or steel that has been treated with a long-lasting coating that is medium to dark brown or medium to dark green in color and has a dulled finish to reduce light reflection and help blend the selected structures into the landscape setting.</p> <p>At least 90 days prior to the planned erection of transmission structures, SCE shall submit to the CPUC a Surface Treatment Plan containing a description of the galvanizing specifications, and samples showing the range of dulling for the structures. The CPUC shall approve the Surface Treatment Plan, or otherwise inform SCE what modifications to the Surface Treatment Plan are necessary, within 30 days after the Plan's submittal by SCE. SCE shall not implement the Surface Treatment Plan until the plan has been approved by the CPUC. Prior to the completion of construction, SCE shall provide the CPUC with documentation that the structures have been galvanized and dulled in accordance with the specifications detailed in the approved Surface Treatment Plan.</p> | Verify non-reflective materials have been used.                       | During construction.      |
|   | <b>MM BIO-5: Habitat Restoration and Mitigation.</b> See below.  |   |                           |
| <i>Impact AE-3: Substantially degrade the existing visual character or quality of the site and its surroundings</i> | <b>MM AE-1:</b> Minimize Permanent Disturbance Aesthetic Impacts. The applicant shall implement methods to restore permanent disturbed areas to conditions that would blend with the overall landscape character to the extent feasible.   | Verify landscape character conditions of permanent disturbance areas. | During post-construction. |



| Impact   | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements                   | Timing                                      |
|--|--|---|---|
|  | <p><b>MM AE-2: Construction Site Upkeep.</b> See above.</p> <p><b>MM AE-3: Reduce Aesthetic Impacts of Retaining Walls and Access Road Improvements.</b> See above.</p> <p><b>MM AE-4: Glare and Color Contrast Reduction for Transmission Structures and Conductors.</b> See above.</p> <p><b>MM BIO-5: Habitat Restoration and Mitigation.</b> See below.</p>  |   |   |
| <p><i>Impact AE-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area</i></p> | <p><b>MM AE-4: Glare and Color Contrast Reduction for Transmission Structures and Conductors.</b> See above.</p>   |   |   |
| <p><b>4.2 Agriculture</b></p>  |  |   |   |
| <p>No applicable APMs or mitigation measures.</p>  |  |   |   |
| <p><b>4.3 Air Quality</b></p>  |  |   |   |
| <p><i>Impact AQ-2: Violate any air quality standard or contribute substantially to an existing or projected air quality violation.</i></p>   | <p><b>APM AQ-1:</b> The following control measures stated in the VCAPCD Ventura County Air Quality Assessment Guidelines to minimize the generation of fugitive dust (PM10 and PM2.5) would be implemented during construction of the proposed project, as feasible:</p> <ul style="list-style-type: none"> <li>• The area disturbed by clearing, grading, earth-moving, or excavation operations shall be minimized to prevent excessive amounts of dust.</li> <li>• Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water (preferably reclaimed, if available) should penetrate sufficiently to minimize fugitive dust during grading activities.</li> <li>• Fugitive dust produced during grading, excavation, and construction activities shall be controlled by the following activities: <ul style="list-style-type: none"> <li>a) All trucks shall be required to cover their loads as required by California Vehicle Code §23114.</li> </ul> </li> </ul> | <p>Verify implementation of measures.</p> | <p>During construction and restoration.</p> |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements | Timing |
|--------|---|-------------------------|--------|
|        | <p>b) All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, shall be treated to prevent fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll-compaction as appropriate. Watering shall be done as often as necessary, and reclaimed water shall be used whenever possible.</p> <ul style="list-style-type: none"> <li>• Graded and/or excavated inactive areas of the construction site shall be monitored by the applicant at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for more than four days. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally safe dust suppressants, to prevent excessive fugitive dust.</li> <li>• Signs shall be posted on site limiting traffic to 15 miles per hour or less.</li> <li>• During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth-moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off site or on site. The site superintendent/supervisor shall use his/her discretion in conjunction with the APCD to determine when winds are excessive.</li> <li>• Adjacent streets and roads shall be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.</li> <li>• Personnel involved in grading operations, including contractors and subcontractors, should be advised to wear</li> </ul> |                         |        |

| Impact   | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements                  | Timing                               |
|--|---|--|--------------------------------------|
|  | respiratory protection in accordance with California Division of Occupational Safety and Health regulations.  |  |                                      |
|  | <p><b>APM AQ-2:</b> The following control measures stated in the VCAPCD Ventura County Air Quality Assessment Guidelines would be implemented during construction of the Project as feasible:</p> <ul style="list-style-type: none"> <li>• Minimize equipment idling time.</li> <li>• Maintain equipment engines in good condition and in proper tune as per manufacturers’ specifications.</li> <li>• Lengthen the construction period during smog season (May through October), to minimize the number of vehicles and equipment operating at the same time.</li> <li>• Use alternatively fueled construction equipment, such as compressed natural gas, liquefied natural gas, or electric, if feasible.</li> </ul>  | Verify implementation of measures.       | During construction and restoration. |
|  | <p><b>MM AQ-1: Tier 3 and 4 Off-Road Emissions Standards.</b> Off-road diesel-powered construction equipment greater than 75 horsepower used during 66-kV subtransmission line or access road construction will meet Tier 3 and Tier 4 off-road emissions standards to the greatest extent feasible during any calendar year in which ROG and NO<sub>x</sub> construction emissions are anticipated to exceed SCAQMD Air Quality Significance Thresholds for Construction. During these years, the applicant will provide the CPUC with annual reports detailing the percentage of off-road diesel-powered construction equipment greater than 75 horsepower used for the proposed project that meet the Tier 3 or Tier 4 classification. The report will also include justification—supported by letters from local rental equipment retailers, documentation from contractors, or other evidence—for any deficiencies in Tier 3 and Tier 4 engine usage where construction activities continue to exceed SCAQMD thresholds.</p> | Verify use of Tier 3 and Tier 4 vehicles | During construction and restoration. |
| <i>Impact AQ-3: Result in a cumulatively considerable net increase of any criteria</i> | <p><b>APM AQ-1:</b> See above.<br/> <b>APM AQ-2:</b> See above.<br/> <b>MM AQ-1: Tier 3 and 4 Off-Road Emissions Standards.</b></p>   |  |                                      |

| Impact  | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements  | Timing  |
|---|--|--|---|
| <i>pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard.</i> | See above.   |  |   |
| <i>Impact AQ-4: Expose sensitive receptors to substantial pollutant concentrations.</i>   | <b>APM AQ-1:</b> See above.<br><b>APM AQ-2:</b> See above.   |  |   |
| <b>4.4 Biological Resources</b>   |  |  |   |
| <i>Impact BR-1: Substantial adverse direct or indirect effect on special status species.</i>  | <b>APM BIO-1:</b> Pre-construction biological surveys for special status plants and wildlife would be conducted 0 to 30 days before the start of construction by a qualified biologist in all laydown/work areas. If a special status species is encountered, biologists will record the location, take a photograph, and delineate a buffer area, as appropriate, where activities should be restricted for the protection of the resource. If impacts on the special status plant(s) or wildlife cannot be avoided, SCE will consult with the appropriate resource agency or agencies. | Verify completion of surveys and avoidance or minimization of impacts to special status species.       | During pre-construction, construction, and restoration. |
|   | <b>APM BIO-2:</b> To the extent feasible, SCE would minimize impacts and permanent loss to native vegetation types, vegetation that may support special status species, and known populations of special status plants at construction sites by avoiding construction activities in areas flagged to be avoided. If it is not possible to avoid impacts on native vegetation, a project revegetation plan may be prepared in consultation with the appropriate agencies for areas of native habitat temporarily impacted during construction.  | Verify placement of flagging and avoidance or minimization of impacts to special status plant species. | During construction and restoration.                    |
|   | <b>APM BIO-3:</b> Biological monitors would monitor construction activities in wildlife habitat areas that may contain special status species, critical habitat for those species, or unique resources to ensure that such species, habitat, or resources are avoided.   | Verify monitoring of ground-disturbing activities in biologically sensitive areas.                     | During construction and restoration.                    |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements   | Timing                                      |
|--------|--|---|---|
|        | <p><b>APM BIO-4:</b> SCE would conduct project-wide nesting bird surveys. SCE would, if feasible, remove trees, vegetation, subtransmission structures, and poles outside of the nesting season. If a tree, subtransmission structure, or pole containing a raptor nest must be removed during nesting season, SCE biologists would consult with the appropriate resource agencies. If work is scheduled to take place in close proximity to an active nest, appropriate nesting buffers or other measures would be established based on consultation with the appropriate resource agencies, or an adaptive management plan would be prepared to address nesting birds, subject to the approval of the CDFW. This project-specific Nesting Bird Management Plan would allow for implementation of species-specific buffer modification guidelines provided by a qualified utility avian biologist; nest buffers would be determined by species' sensitivity to disturbance, the nature of the construction activity, and the environmental conditions surrounding the nest.</p> | <p>Verify completion of surveys. Review adequacy of plan and implementation of plan.</p>                          | <p>During construction and restoration.</p> |
|        | <p><b>APM BIO-5:</b> During the pre-construction surveys, a qualified biologist would identify any potential San Diego desert woodrat (<i>Neotoma lepida intermedia</i>) middens within 50 feet of project activities. At the discretion of a qualified biologist, an exclusion buffer would be established around any woodrat middens that can be avoided, and these exclusion zones would be flagged or fenced to protect the nest during the breeding season (October through June). If a woodrat midden cannot be avoided by the proposed project's activities, an appropriate resource agency would be consulted regarding a potential buffer reduction.</p>  | <p>Verify the completion of surveys and the avoidance or minimization of impacts on San Diego desert woodrat.</p> | <p>During pre-construction.</p>             |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements  | Timing                                      |
|--------|--|--|---|
|        | <p><b>APM BIO-6:</b> A pre-construction, focused burrowing owl protocol survey shall be conducted no more than 30 days prior to commencement of ground-disturbing activities within suitable habitat to determine if any occupied burrows are present. If occupied burrows are found, adequate buffers shall be established around burrows based on a project-specific nesting bird management plan or consultation with the appropriate agencies. If occupied burrows cannot be avoided, an appropriate relocation strategy would be developed in conjunction with the CDFW and may include collapsing burrows outside of nesting season and using exclusionary devices to reduce impacts on the burrowing owl. Biological monitors would monitor all construction activities that have the potential to impact active burrows.</p> | <p>Verify the completion of surveys and the avoidance or minimization of impacts on burrowing owl.</p> | <p>During pre-construction.</p>             |
|        | <p><b>APM BIO-7:</b> The National Pollutant Discharge Elimination System Construction General Permit would require SCE to develop and implement a Stormwater Pollution Prevention Plan (SWPPP), which specifies best management practices (BMPs) to avoid or minimize impacts to water quality and riparian habitat during construction. See Appendix B for example BMPs provided by SCE.</p>  | <p>Verify development and implementation of SWPPP BMPs.</p>  | <p>During construction and restoration.</p> |
|        | <p><b>APM GEN-1:</b> See below.<br/><b>APM AQ-1:</b> See above.</p>  |  |   |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements  | Timing   |
|--------|---|--|--|
|        | <p><b>MM BIO-1: Limits of Construction Activities: Project Boundaries and Sensitive Areas Clearly Marked.</b> In all locations of the project, construction activities, vehicular traffic (including movement of all equipment), and storage of construction materials will be restricted to approved access roads and established construction areas indicated by flagging, fencing, and/or signage. The applicant will ensure that exclusionary fencing is installed prior to the start of construction activities around laydown/work and staging areas, where necessary, to prevent inadvertent encroachment into the native habitat adjacent to areas of impact. Identified sensitive resources such as hydrologic features, special status plants and natural communities, and known wildlife habitat of special status species (e.g., nests, burrows, dens, middens) will be assigned a buffer as appropriate and clearly marked (e.g., with signs, flagging, ropes, and/or fencing) and avoided unless previously approved. A CPUC-approved qualified biologist will propose a buffer distance if sensitive resources are identified, and the applicant will consult with the CPUC and resource agency (ies) to determine whether the proposed buffer distance is appropriate. The CPUC-approved qualified biologist will perform or supervise flagging and fencing to ensure that these activities are conducted without harm to sensitive species or habitat.</p> | <p>Verify demarcation and avoidance of project boundaries and sensitive areas.</p> | <p>During pre-construction, construction, and restoration.</p> |
|        | <p><b>MM BIO-2: Preconstruction Survey Timing and Location Stipulations.</b> Pre-construction surveys for special status plant and wildlife species will be conducted in all access, laydown/work, and staging areas where suitable habitat is present, including all tower installation sites, existing and proposed access roads, staging areas, and tower footing removal sites. Pre-construction surveys will not include searches for special status fish. Rather, fish presence will be assumed at the locations described in this analysis, and CPUC-approved biological monitors will record any loss, injury, or other interactions with special status fish (as required in APM BIO-3).</p>   | <p>Verify completion of pre-construction surveys and daily clearance sweeps.</p>   | <p>During pre-construction, construction, and restoration.</p> |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements   | Timing   |
|--------|---|---|--|
|        | <p>Additionally, a CPUC-approved qualified biologist will conduct pre-construction clearance sweeps for special status species at all access, staging, and laydown/work areas where suitable habitat is present within approximately 24 hours of construction activities each day.</p> <p>If a special status species is found at any time, the applicant will contact the appropriate wildlife agency (ies), in addition to the CPUC, within 48 hours.</p>   |   |  |
|        | <p><b>MM BIO-3: Noxious and Invasive Weed Control Plan.</b><br/>Prior to construction, the applicant will submit a Noxious and Invasive Weed Control Plan that is to be implemented before, during, and after construction and restoration of the proposed project. The final Noxious and Invasive Weed Control Plan shall be implemented, as specified, throughout construction and restoration. This plan will include measures designed to avoid the introduction and spread of noxious weeds and invasive plant species designated by the state, the counties, or local weed control boards. At a minimum, this plan will include the following measures:</p> <ul style="list-style-type: none"> <li>• Pre-construction surveys for special status plant species (APM BIO-1 and MM BIO-2) will include surveys for state- and county-designated noxious weed species. The applicant will coordinate with the appropriate agencies, including the CPUC, to determine appropriate species-specific measures to implement, or whether control or treatment of a species is feasible.</li> <li>• If an invasive weed species is present at a given site, soils excavated from this location for use in construction and restoration activities (e.g., backfilling, road rehabilitation, etc.) will not be transported to a location that does not already contain the said invasive species.</li> </ul> | <p>Review adequacy of plan and verify implementation of plan.</p> | <p>During pre-construction, construction, and restoration.</p> |



| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements | Timing |
|--------|---|-------------------------|--------|
|        | <ul style="list-style-type: none"> <li>• All vehicles and equipment will be cleaned off site prior to initial arrival at the project.</li> <li>• Crews, with construction inspector oversight, will ensure that vehicles and equipment are free of soil and debris capable of transporting noxious weed seeds, roots, or rhizomes before the vehicles and equipment are allowed use of access roads.</li> <li>• Vehicle and equipment wash stations (mobile or built in place) will be erected at strategic locations on the right-of-way where designated weed species have been detected, and where doing so would help prevent the spread of these species.</li> <li>• Straw, hay, gravel, soil, or other construction materials that could inadvertently contain unwanted plant propagules will come from state-cleared sources that are free of invasive weeds.</li> <li>• All seeds to be used in revegetation and reclamation activities will come from weed-free sources.</li> <li>• All temporary disturbance areas not subject to existing infestations of invasive plants, including access roads, transmission line corridors, and towers, will be monitored for invasive species establishment on a quarterly basis for at least one year after project construction and restoration is completed. If evidence of invasive species introduction is found, the applicant will coordinate with appropriate agencies, including the CPUC, to determine appropriate species-specific measures to implement.</li> <li>• This plan will be developed in consultation with resource agencies (CDFW, Santa Barbara and Ventura Counties, CPUC, as appropriate) and will be provided to these agencies for review and comment. The plan must be finalized and approved by the CPUC prior to the start of construction. Santa</li> </ul> |                         |        |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements   | Timing                                      |
|--------|--|---|---|
|        | <p>Barbara County must approve plan language that relates to areas within its jurisdiction prior to project activities within the Santa Barbara Coastal Development Zone.</p>  |   |   |
|        | <p><b>MM BIO-4: Limit Removal of Native Plants, Trees, and Natural Communities.</b></p> <ul style="list-style-type: none"> <li>• Temporary construction areas will be impacted in such a way that facilitates post-construction restoration. For example, drive-and-crush methods in areas with native vegetation will be employed where possible.</li> <li>• The applicant will consult with a qualified arborist for the trimming and removal of all native vegetation. The applicant will work with the qualified arborist to determine the minimum amount of vegetation removal required to accommodate project construction and restoration, as well as the correct trimming procedures to employ. Additionally, the applicant will work with the qualified arborist to preserve root zone aeration and the stability of native trees where possible.</li> <li>• The applicant will consult with the appropriate agency, including the CPUC, and will adhere to any regulations and permit conditions for the following impacts:                         <ul style="list-style-type: none"> <li>• Impacts on Critical Habitat.</li> <li>• Impacts on ESHAs in the Coastal Zone.</li> <li>• Impacts on special status natural communities, including riparian communities, southern California black walnut woodland, southern coast live oak riparian forest, and southern sycamore alder riparian woodland.</li> <li>• Impacts on coast live oak trees in the Coastal Zone (specifically,</li> </ul> </li> </ul> | <p>Verify implementation of any avoidance, minimization, and mitigation measures.</p> | <p>During construction and restoration.</p> |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements   | Timing   |
|--------|---|---|--|
|        | <p>consistency with Policy 9-35 and Policy 9-36 of the Santa Barbara County Coastal Land Use Plan is required).</p>   |   |  |
|        | <p><b>MM BIO-5: Habitat Restoration and Mitigation.</b></p> <ul style="list-style-type: none"> <li>• The applicant will ensure that all areas that are temporarily impacted are restored as closely to pre-construction conditions as possible. Alternatively, areas that do not provide habitat to special status species or sensitive resources may be restored to the conditions agreed upon between the landowner and the applicant.</li> <li>• Prior to construction, the applicant will submit a Habitat Restoration and Mitigation Plan to address areas of habitat loss to be restored or mitigated (for disturbances to jurisdictional features, see MM BIO-8. This plan will be developed in consultation with resource agencies (NMFS, USFWS, CDFW, Santa Barbara and Ventura Counties, CPUC, as appropriate) and will be provided to these agencies for review and comment. The plan must be finalized and approved by the CPUC prior to the start of construction. Santa Barbara County must approve plan language that relates to areas within their jurisdiction, prior to project activities within the Coastal Development Zone.</li> <li>• The plan will include details, including but not limited to, topsoil segregation and conservation; vegetation treatment and removal; revegetation methods, including seed mixes, rates, and transplants; criteria to monitor and evaluate revegetation success; and compensation and remedial measures to be implemented as needed.</li> <li>• All disturbances to special status plants, county-</li> </ul> | <p>Review adequacy of plan and verify implementation of plan.</p> | <p>During pre-construction, construction, and restoration.</p> |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements   | Timing                                      |
|--------|---|---|---|
|        | <p>protected trees, and special status natural communities will be restored or mitigated, and the plan will specify how each type will be addressed in terms of the above restoration details and/or other mitigation. For special status plant species, such as Santa Barbara honeysuckle or Nuttall’s scrub oak, or special status natural communities in which mitigation requirements may not be specified through permits, restoration will occur after construction at a level of 1:1. This will be completed through one of the following methods:</p> <ul style="list-style-type: none"> <li>- Establishing the species/natural community habitat within the proposed project areas (onsite);</li> <li>- Establishing the species/natural community habitat outside the proposed project areas (offsite); or</li> <li>- Purchasing credits and/or mitigation lands at an entity approved by CDFW.</li> </ul> <p>For Options 1 and 2 (onsite and offsite), post-construction monitoring will be performed for one to five years, depending on the disturbance level and restoration level, and the success criteria will be specified in the plan.</p> |   |   |
|        | <p><b>MM BIO-6: Wildlife Protection.</b> To prevent entrapment of wildlife, all steep-walled trenches, auger holes, or other excavations will be covered at the end of each day. Fencing will be maintained around the covered excavations at night. For any open excavations, earthen escape ramps will be maintained. A CPUC-approved biological monitor 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. Any wildlife species found will be safely removed and relocated</p>   | <p>Verify excavations are covered at the end of each work day and monitored regularly. Verify construction trash is properly contained and regularly removed from construction sites.</p> | <p>During construction and restoration.</p> |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements  | Timing   |
|--------|--|--|--|
|        | <p>out of harm’s by a CPUC-approved biological monitor, using suitable tools such as a pool net when applicable.</p> <p>Measures will be taken to prevent impacts from project-related trash. All trash, including decomposable food scraps, will be stored in sturdy, animal-proof containers, and emptied regularly. All project construction vehicles will be equipped with trash bags.</p>   |  |  |
|        | <p><b>MM BIO-7: Night Lighting.</b> Night lighting for construction and restoration use, such as to illuminate staging areas, may be used from dusk to dawn. All lighting will be shielded and directed downward to minimize the potential for glare or spillover onto adjacent properties and to reduce impacts on local wildlife. The applicant will indicate anticipated measures to resource agencies and the CPUC for approval prior to construction. The approved measures will be provided to the CPUC.</p>   | <p>Verify proper shielding of lighting.</p>  | <p>During construction and restoration.</p>                    |
|        | <p><b>MM BIO-8: Impact Reduction on Hydrologic Features and Aquatic Habitat.</b> Prior to project construction for all proposed project components in the vicinity of hydrologic features, the applicant will:</p> <ul style="list-style-type: none"> <li>• Ensure that CPUC-approved biological monitors will establish and maintain a minimum exclusionary buffer of 50 feet from the delineated extent of all jurisdictional features during construction and restoration. If the applicant cannot maintain the 50 foot exclusionary buffer from the delineated bed/bank of a drainage feature or associated riparian habitat during project construction and restoration, the applicant will consult with appropriate agencies about the need for any necessary permits (e.g., USFWS, NMFS, CDFW, USACE, CPUC, County, as appropriate); will provide standard SWPPP BMP measures to prevent any solid or liquid materials from entering the drainage; and will submit proposed measures to CPUC for approval prior to</li> </ul> | <p>Verify demarcation and avoidance of jurisdictional water. Verify implementation of SWPPP BMPs. Review adequacy of plan and verify implementation of plan.</p> | <p>During pre-construction, construction, and restoration.</p> |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements   | Timing                          |
|--------|--|---|---------------------------------|
|        | <p>construction. Measures should include information on crossing streams on road beds. Vehicle or equipment travel and construction or restoration of any proposed project component that requires altering, removing, or filling the bed or bank of seasonal drainages or other jurisdictional or potentially jurisdictional water features will be performed only when water is not present in the feature, unless otherwise permitted by agencies (e.g., USFWS, NMFS, CDFW, USACE, CPUC, and County, as appropriate).</p> <ul style="list-style-type: none"> <li>• Prior to construction the applicant will submit a Hydrologic Features Mitigation Monitoring Plan for affected hydrologic features in consultation with resource agencies (USFWS, NMFS, CDFW, USACE, Santa Barbara County, CPUC, as appropriate) and will provide to these agencies for review and comment. The plan must be finalized and approved by the CPUC prior to the start of construction. Santa Barbara County must approve plan language that relates to areas within their jurisdiction, prior to project activities within the Coastal Development Zone.</li> <li>• The plan will provide measures to accomplish restoration, criteria for restoration success, a post-construction monitoring schedule, and compensation ratios for impacted jurisdictional areas.</li> </ul> |   |                                 |
|        | <p><b>MM BIO-9: California Red-Legged Frog Impact Reduction Measures.</b> To reduce impacts on California red-legged frog, the following measures will be implemented:</p> <ul style="list-style-type: none"> <li>• A CPUC-approved qualified biologist will conduct habitat assessment surveys in accordance with the most recent USFWS protocol (e.g., USFWS Revised Guidance on Site Assessments and Field Surveys for</li> </ul>   | <p>Verify the completion of surveys and the avoidance or minimization of impacts on California red-legged frog.</p> | <p>During pre-construction.</p> |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements | Timing |
|--------|---|-------------------------|--------|
|        | <p>the California Red-legged Frog, August 2005) for California red-legged frog at all jurisdictional drainage features that would be impacted in project area prior to construction (Table 4.4-4).</p> <ul style="list-style-type: none"> <li>• In areas where suitable habitat is determined to be present, pre-construction surveys in accordance with the most recent USFWS protocol (e.g., USFWS Revised Guidance on Site Assessments and Field Surveys for the California Red-legged Frog August 2005) for the California red-legged frog will be conducted to determine presence in the vicinity of the project area.</li> <li>• If this species is identified in the project area at any time, the USFWS, CDFW, and CPUC will be notified within 48 hours and the applicant will consult with these agencies to determine the appropriate next steps.</li> <li>• In suitable habitat for California red-legged frog, the applicant may perform protocol level, pre-construction surveys to confirm the absence of the species. If such surveys are not conducted, or if the surveys do not confirm absence, the applicant and/or its contractors will minimize impacts on California red-legged frog by avoiding suitable habitat whenever possible. Additional measures to avoid and minimize impacts to California red-legged frog and their habitat will be implemented as required by USFWS, but will include the following at a minimum:                         <ul style="list-style-type: none"> <li>○ A USFWS-approved biologist will survey the work site no more than two weeks before the onset of construction activities.</li> <li>○ If California red-legged frogs are found, relocations will be conducted only in consultation with the USFWS. If the USFWS approves moving animals, the</li> </ul> </li> </ul> |                         |        |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements | Timing |
|--------|--|-------------------------|--------|
|        | <p>approved biologists will be allowed sufficient time to move California red-legged frog from the work site before work activities begin. Only USFWS-approved biologists will participate in activities associated with the capture, handling, and monitoring of California red-legged frog. Evidence of the USFWS’s approval of red-legged frog biologists will be submitted to the CPUC.</p> <ul style="list-style-type: none"> <li>○ Before any construction activities begin on a project, a USFWS-approved biologist will conduct a training session for all construction personnel. At a minimum, the training will include a description of the California red-legged frog and its habitat and the general measures that are being implemented to conserve the California red-legged frog as they relate to the project.</li> <li>○ A USFWS-approved biologist will be present at the work site until such time as all removal of California red-legged frogs, instruction of workers, and habitat disturbance have been completed. After this time, the applicant may designate a CPUC-approved qualified biological monitor to monitor on-site compliance with all minimization measures.</li> <li>○ The qualified CPUC-approved biological monitor and the USFWS-approved biologist will have the authority to halt any action that may result in impacts to California red-legged frog.</li> <li>○ During project activities, all trash that may attract predators will be properly contained, removed from the work site, and disposed of regularly. Following construction, all trash and construction debris will be</li> </ul> |                         |        |



| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements   | Timing   |
|--------|--|---|--|
|        | <p>removed from work areas.</p> <ul style="list-style-type: none"> <li>○ All fueling and maintenance of vehicles and other equipment and staging areas will occur at least 100 feet from any riparian and aquatic habitat. All workers will be informed of the importance of preventing spills and the appropriate measures to take should a spill occur.</li> </ul>   |   |  |
|        | <p><b>MM BIO-10: Nesting Bird Management Plan.</b> Prior to construction, the applicant will submit a project-specific Nesting Bird Management Plan in consultation with the USFWS, CDFW, and CPUC, which provides measures and an adaptive management program designed to avoid or reduce impacts on special-status and MBTA-protected bird species during nesting periods. The final Nesting Bird Management Plan shall be implemented, as specified, throughout construction and restoration. This plan will include the following information:</p> <ul style="list-style-type: none"> <li>• Appropriate survey timing, extents, and methods; approved nest deterrent methods, including areas where vegetation will be cleared for the purpose of deterring nesting; inactive nest management; monitoring and reporting protocols during construction; protocol for determining whether a nest is active; protocol for documenting, reporting, and protecting active nests within construction and restoration areas. If pre-construction survey protocols exist for a certain species, the plan will outline the implementation of these protocols.</li> <li>• Appropriate and effective buffer distances, including horizontal buffers from nests, horizontal buffers from territories if appropriate, and vertical buffers for helicopters. Buffers will not be based on generalized assumptions regarding all nesting birds, but will be site- and species/guild-specific and account for specific stage of nesting cycle and</li> </ul> | <p>Review adequacy of plan and verify implementation of plan.</p> | <p>During pre-construction, construction, and restoration.</p> |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements  | Timing   |
|--------|---|--|--|
|        | <p>construction work type.</p> <ul style="list-style-type: none"> <li>• During construction and restoration, a CPUC-approved avian biologist will implement the appropriate buffer distance in accordance with the Nesting Bird Management Plan.</li> <li>• A process for reducing nesting bird buffer distances. Buffer reductions for special-status species and raptors must receive concurrence by appropriate wildlife agencies and the CPUC. Buffer reductions for common species will be determined by the CPUC-approved biologist, and the applicant will notify the CPUC prior to implementation.</li> <li>• The minimum requirements to become a CPUC-approved avian biologist and biological monitor for nesting birds, including the minimum required education, experience in conducting biological surveys, and experience with specific birds in the project area.</li> <li>• The CPUC-approved biological monitor will halt work if it is determined that active nesting would be disturbed by construction or restoration activities until further direction or approval to work is obtained from the CPUC and/or appropriate wildlife agencies.</li> </ul> <p>This plan will be submitted to the wildlife agencies and the CPUC for review and comment, and the plan will be finalized and approved by the CPUC prior to the start of construction.</p> <p><b>MM BIO-11: Burrowing Owl Impact Reduction Measures.</b> To further reduce impacts on burrowing owls, the following measures will be implemented:</p> <ul style="list-style-type: none"> <li>• A CPUC-approved qualified biologist familiar with burrowing owl biology and survey methods will conduct pre-construction surveys for this species.</li> <li>• Surveys for burrowing owls will be conducted no more than 30 days prior to construction activities</li> </ul> |  |  |
|        |   | <p>Verify the completion of pre-construction surveys and the avoidance or minimization of impacts on burrowing owl. If necessary, review adequacy of plan and verify implementation of plan.</p> | <p>During pre-construction, construction, and restoration.</p> |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements | Timing |
|--------|---|-------------------------|--------|
|        | <p>during the non-breeding season and no more than 14 days prior to construction in the breeding season, to confirm whether burrowing owls occupy the site, and if so, whether the owls are actively nesting. Surveys will be done throughout the project areas of potential effect, plus an additional area extending 300 feet from the proposed project’s boundaries.</p> <ul style="list-style-type: none"> <li>• If an occupied burrow is identified, the CPUC-approved qualified biologist will recommend an appropriate buffer based on the circumstances (e.g., owl tolerance and construction activity level) and as explained by the <i>Staff Report on Burrowing Owl Mitigation</i> (CDFG 2012 or more recent). The buffer will be approved by the CPUC.</li> <li>• If preconstruction surveys identify a burrowing owl then the applicant will submit a Burrowing Owl Compensation Plan in consultation with appropriate wildlife agencies and the CPUC that is consistent with mitigation guidelines as outlined in the <i>Staff Report on Burrowing Owl Mitigation</i> (CDFG 2012 or more recent) prior to construction. The final Burrowing Owl Compensation Plan shall be implemented, as specified, throughout construction and restoration. The plan will describe the compensatory measures that will be undertaken to address the loss of burrowing owl burrows within the project area. This will include mitigation for permanent impacts on nesting, occupied and satellite burrows and occupied burrowing owl habitat with (a) permanent conservation of similar vegetation communities comparable to or better than that of the impact area, and (b) sufficiently large acreage, and presence of fossorial mammals.</li> <li>• The CDFW and the CPUC will be notified of all project-related burrowing owl injuries or mortalities</li> </ul> |                         |        |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements   | Timing   |
|--------|--|---|--|
|        | <p>within 12 hours of discovery and will follow CDFW's recommended actions.</p>  |   |  |
|        | <p><b>MM BIO-12: Southwestern Willow Flycatcher and Least Bell's Vireo Impacts Reduction Measures.</b> To reduce impacts on southwestern willow flycatcher, the following measures will be implemented:</p> <ul style="list-style-type: none"> <li>• A CPUC-approved qualified biologist will conduct habitat assessment surveys for southwestern willow flycatcher and least Bell's vireo at all jurisdictional drainage features that would be impacted in project area (Table 4.4-4). In addition, habitat assessments should be conducted at any other drainage where construction activities (e.g., overhead stringing by helicopter) could impact this species, including the section of Ventura River that is spanned by the project.</li> <li>• In areas where suitable habitat is determined to be present, pre-construction nesting season surveys following the most recent USFWS protocol for the southwestern willow flycatcher and least Bell's vireo will be conducted to determine presence in the vicinity of the project area.</li> <li>• If either species is found to actively nest in the project area, the USFWS, CDFW, and CPUC will be notified within 48 hours of nesting or territory confirmation. In the event that a southwest willow flycatcher or least Bell's vireo individual or nest is observed, biologists will establish and maintain an exclusionary buffer as specified in the Nesting Bird Management Plan (MM BIO-10).</li> </ul> | <p>Verify the completion of pre-construction surveys and the avoidance or minimization of impacts on southwestern willow flycatcher and least Bell's vireo.</p> | <p>During pre-construction, construction, and restoration.</p> |
|        | <p><b>MM BIO-13: Ringtail and American Badger Impacts Reduction Measures.</b> To reduce impacts on ringtail and American badger, the following measures will be</p>  | <p>Verify the completion of pre-construction surveys and the avoidance or</p>   | <p>During pre-construction, construction, and restoration.</p> |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements   | Timing |
|--------|--|---|--------|
|        | <p>implemented:</p> <ul style="list-style-type: none"> <li>• If occupied ringtail dens or badger burrows are observed during pre-construction surveys or sweeps a CPUC-approved qualified biologist will recommend an appropriate buffer distance around the den or burrow to the CPUC. Once the distance is approved by the CPUC, the biologist will demarcate the disturbance buffer and construction activities will be restricted within the buffer.</li> <li>• CPUC-approved qualified biologists will be notified if ringtails or badgers are observed within the project area during construction activities. Work will immediately be stopped in the area if the CPUC-approved qualified biologists find an occupied den or burrow within 100 feet of construction activities. Work can resume once the den or burrow is confirmed to be unoccupied by a CPUC-approved qualified biologist or an appropriate buffer is approved by the CPUC and implemented.</li> <li>• If badger burrows cannot be avoided, a CPUC-approved qualified biologist will ensure passive relocation of the occupants by installing one-way trap doors on the burrow. The burrow will be collapsed after the badger vacates.</li> <li>• During the spring months when young may be present in burrows, burrows must be checked for young before installation of the one-way trap door. If young are present during relocation efforts, all work will stop within 100 feet of the burrow until the young have left the burrows within the project area.</li> <li>• If ringtail dens cannot be avoided, the applicant will consult the appropriate agencies (CDFW, CPUC) to determine an appropriate course of action, including potential passive relocation or other measures.</li> </ul> | <p>minimization of impacts on ringtail and American badger.</p> |        |

| Impact  | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements   | Timing  |
|---|--|---|---|
|   | <ul style="list-style-type: none"> <li>Prior to any relocation efforts, the applicant will obtain specific approval from the appropriate agencies (CDFW, CPUC).</li> </ul> <p><b>MM BIO-14: O&amp;M Mitigation.</b> For O&amp;M activities that require ground disturbance or vegetation clearance, including tree trimming, in project areas that pose a risk to sensitive species or their habitat, as identified in Appendix D, “Biological Technical Report for the Santa Barbara County Reliability Project,” SCE shall implement APMs and MMs consistent with those required during the construction phase for the same activities in these same work areas. Compliance with these APMs and MMs shall be in addition to state, federal, and local regulations and permit requirements that are not preempted by the CPUC. Appropriate measures will be determined based on the habitat and sensitive resources within each O&amp;M work area and will be consistent with those required during the construction phase for these same work areas. The applicant will submit records on an annual basis to the CPUC Energy Division documenting locations where ground disturbing and vegetation clearance activities were performed and a record of the APMs and MMs that were implemented. The applicant will also submit records on an annual basis to Santa Barbara County if such O&amp;M activities occur in the Santa Barbara Coastal Zone during the reporting period.</p> | <p>Review the applicant’s annual records and verify that appropriate APMs and MMs were implemented. Verify that appropriate records were submitted to Santa Barbara County.</p> | <p>Prior to and during operations and maintenance activities requiring ground disturbance or vegetation clearance, including tree trimming.</p> |
| <p><b>Impact BR-2: Substantial adverse effect on riparian habitat or other sensitive natural community.</b></p> | <p><b>APM BIO-1:</b> See above.<br/> <b>APM BIO-2:</b> See above.<br/> <b>APM BIO-3:</b> See above.<br/> <b>APM BIO-7:</b> See above.<br/> <b>APM AQ-1:</b> See above.<br/> <b>APM GEN-1:</b> See below.<br/> <b>MM BIO-1: Limits of Construction Activities: Project Boundaries and Sensitive Areas Clearly Marked.</b> See above.<br/> <b>MM BIO-3: Noxious and Invasive Weed Control Plan.</b> See</p>  |   |   |

| Impact  | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements | Timing |
|---|--|-------------------------|--------|
|   | <p>above.</p> <p><b>MM BIO-4: Limit Removal of Native Plants, Trees, and Natural Communities.</b> See above.</p> <p><b>MM BIO-5: Habitat Restoration and Mitigation.</b> See above.</p> <p><b>MM BIO-14: O&amp;M Mitigation.</b> See above.</p>  |                         |        |
| <p><i>Impact BR-3: Substantial adverse effect on federally protected wetlands.</i></p>  | <p><b>APM BIO-2:</b> See above.</p> <p><b>APM BIO-3:</b> See above.</p> <p><b>APM BIO-7:</b> See above.</p> <p><b>APM AQ-1:</b> See above.</p> <p><b>APM GEN-1:</b> See below.</p> <p><b>MM BIO-1: Limits of Construction Activities: Project Boundaries and Sensitive Areas Clearly Marked.</b> See above.</p> <p><b>MM BIO-3: Noxious and Invasive Weed Control Plan.</b> See above.</p> <p><b>MM BIO-4: Limit Removal of Native Plants, Trees, and Natural Communities.</b> See above.</p> <p><b>MM BIO-5: Habitat Restoration and Mitigation.</b> See above.</p> <p><b>MM BIO-8: Impact Reduction on Hydrologic Features and Aquatic Habitat.</b> See above.</p> <p><b>MM BIO-14: O&amp;M Mitigation.</b> See above.</p> |                         |        |
| <p><i>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.</i></p> | <p><b>APM BIO-3:</b> See above.</p> <p><b>APM GEN-1:</b> See below.</p> <p><b>MM BIO-1: Limits of Construction Activities: Project Boundaries and Sensitive Areas Clearly Marked.</b> See above.</p> <p><b>MM BIO-2: Preconstruction Survey Timing and Location Stipulations.</b> See above.</p> <p><b>MM BIO-3: Noxious and Invasive Weed Control Plan.</b> See above.</p> <p><b>MM BIO-4: Limit Removal of Native Plants, Trees, and Natural Communities.</b> See above.</p>   |                         |        |

| Impact   | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements   | Timing   |
|--|---|---|--|
|  | <p><b>MM BIO-5: Habitat Restoration and Mitigation.</b> See above.</p> <p><b>MM BIO-6: Wildlife Protection.</b> See above.</p> <p><b>MM BIO-7: Night Lighting.</b> See above.</p> <p><b>MM BIO-8: Impact Reduction on Hydrologic Features and Aquatic Habitat.</b> See above.</p> <p><b>MM BIO-10: Nesting Bird Management Plan.</b> See above.</p> <p><b>MM BIO-14: O&amp;M Mitigation.</b> See above.</p>   |   |  |
| <p><i>Impact BR-5: Conflict with local policy and ordinance protecting oak trees.</i></p>  | <p><b>APM BIO-1:</b> See above.</p> <p><b>APM BIO-2:</b> See above.</p> <p><b>APM BIO-3:</b> See above.</p> <p><b>APM GEN-1:</b> See below.</p> <p><b>MM BIO-1: Limits of Construction Activities: Project Boundaries and Sensitive Areas Clearly Marked.</b> See above.</p> <p><b>MM BIO-2: Preconstruction Survey Timing and Location Stipulations.</b> See above.</p> <p><b>MM BIO-3: Noxious and Invasive Weed Control Plan.</b> See above.</p> <p><b>MM BIO-4: Limit Removal of Native Plants, Trees, and Natural Communities.</b> See above.</p> <p><b>MM BIO-5: Habitat Restoration and Mitigation.</b> See above.</p> <p><b>MM BIO-14: O&amp;M Mitigation.</b> See above.</p> |   |  |
| <p><b>4.5 Cultural Resources</b></p>   |   |   |  |
| <p><i>Impact CR-1: Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.</i></p> | <p><b>APM CUL-1: Avoidance, Minimization, and Mitigation.</b> Potential project-related effects on historical resources may be mitigated or reduced to a less than significant level by implementing SCE’s cultural resources Unanticipated Discovery Plan and employing one or more standard practice mitigation scenarios including, but not limited to:</p>  | <p>Review adequacy of plan and verify implementation of plan.</p> | <p>During pre-construction, construction, and restoration.</p> |



| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements | Timing |
|--------|---|-------------------------|--------|
|        | <ul style="list-style-type: none"> <li>• Prehistoric Resources                             <ul style="list-style-type: none"> <li>- avoid where feasible (avoidance by design, preserve in place, capping)</li> <li>- minimize (reduction of Area of Direct Impact/Effect)</li> <li>- mitigate (historic context statement, data recovery)</li> </ul> </li> <li>• Historic Resources                             <ul style="list-style-type: none"> <li>- avoid where feasible (avoidance by design, preserve in place, capping)</li> <li>- minimize (reduction of Area of Direct Impact/Effect)</li> <li>- mitigate (historic context statement, data recovery)</li> </ul> </li> <li>• Historic Architecture/Utility Infrastructure                             <ul style="list-style-type: none"> <li>- avoid where feasible (avoidance by design, preserve in place)</li> <li>- minimize (reduction of Area of Direct Impact/Effect)</li> <li>- mitigate (historic context statement, Historic American Engineering Record, Historic American Building Survey, advanced California Department of Parks and Recreation recordation)</li> </ul> </li> </ul> <p>The applicant’s Unanticipated Discovery Plan would describe the procedures to be followed in the event that previously unidentified cultural resources are discovered during construction of the proposed project. If previously unidentified cultural resources are discovered during construction, personnel would be instructed to suspend work in the vicinity of the find.</p> |                         |        |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements         | Timing                          |
|--------|--|---------------------------------|---------------------------------|
|        | <p>The resource would then be evaluated for listing in the CRHR by a qualified archaeologist, and, if the resource is determined to be eligible for listing in the CRHR, either the resource would be avoided or mitigated. If human skeletal remains are uncovered during construction of the proposed project, the applicant and/or its contractors shall immediately halt all work in the immediate area, contact the applicable County Coroner to evaluate the remains, and follow the procedures and protocols set forth in Section 15064.5 (e)(1) of the CEQA Guidelines.</p> <ul style="list-style-type: none"> <li>Per Health and Safety Code 7050.5, upon the discovery of human remains, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains. If the applicable County Coroner determines that the remains are Native American, it is anticipated that the coroner would contact the Native American Heritage Commission in accordance with Health and Safety Code Section 7050.5(c) and Public Resources Code 5097.98 (as amended by Assembly Bill 2641). In addition, the applicant shall ensure that the immediate vicinity where the Native American human remains are located is not damaged or disturbed by further development activity until the applicant has discussed and conferred, as prescribed in Public Resources Code 5097.98, with the most likely descendants regarding their recommendations.</li> </ul> |                                 |                                 |
|        | <p><b>APM CUL-2: Paleontological Resources Management Plan (PRMP).</b> SCE shall prepare and implement a PRMP that would include, but not be limited to: preconstruction coordination; recommended monitoring methods; emergency discovery procedures; sampling and data recovery methods, if needed; museum storage coordination for any specimens and data recovered; and reporting requirements. The PRMP would also provide for sediment screening, fossil preparation, curation, and preparation of a report detailing the results of the work. In addition, the PRMP would specify monitoring</p>  | <p>Verify adequacy of plan.</p> | <p>During pre-construction.</p> |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements   | Timing   |
|--------|--|---|--|
|        | <p>requirements such as the presence of a paleontological monitor when work is being performed at formations with high paleontological sensitivity. If very few or no fossil remains are found during ground-disturbing activities, monitoring time can be reduced or suspended entirely, per recommendations of the paleontological field supervisor.</p>   |   |  |
|        | <p><b>APM CUL-3:</b> A cultural resources survey of those areas that could not be previously accessed would be conducted prior to the start of construction. These surveys would identify and/or address any potential sensitive cultural resources that may be impacted by the Project, including the substation sites, subtransmission line and telecommunication cable routes, wire stringing locations, access and spur roads, drilling and crane pads, and staging yards.</p>   | <p>Verify completion of surveys.</p>  | <p>During pre-construction.</p>                                |
|        | <p><b>MM CR-1: Additional Cultural Resources Surveys.</b> Prior to issuance of construction permits, the applicant will ensure that qualified archaeological consultants, as specified in the Cultural Resources Plans, will 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 that, prior to the project, had been undisturbed. Reports that specify the research design, methods, and survey results will be submitted to the CPUC for review and must be accepted by the CPUC prior to the start of ground disturbance in the unsurveyed areas.</p> | <p>Verify completion of surveys.</p>  | <p>During pre-construction.</p>                                |
|        | <p><b>MM CR-2: Avoid Known Cultural Resources.</b> Prior to construction, on a complete set of final project construction plans, cultural resources sites will be denoted as Environmentally Sensitive Areas by a CPUC-approved cultural resources consultant (MM CR-3). If any project-related construction or restoration activity will occur within 50 feet of CA-VEN-58, CA-SBA-3587, GANDA-1, or any other known cultural resource site, the sites will be designated as Environmentally Sensitive Areas. This list is not intended to be exhaustive and may not include all sites denoted as Environmentally Sensitive Areas on the project plans. The</p>                           | <p>Verify demarcation of environmentally sensitive areas and avoidance of known cultural resources.</p> | <p>During pre-construction, construction, and restoration.</p> |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements         | Timing                          |
|--------|---|---------------------------------|---------------------------------|
|        | <p>project plans will become confidential and only be provided to approved cultural resources consultants, Native American monitors approved by a tribe (MM CR-5) for monitoring during project construction (if applicable), and the applicant’s Environmental Coordinators and construction supervisors. A CPUC cultural resources specialist will approve the demarked plans prior to start of construction.</p> <p>Prior to the start of construction activities within 100 feet of cultural resources, temporary fencing or signage will be erected, as feasible, with the approval of the CPUC. The temporary fencing or signage will be installed by or under the direct supervision of a qualified archaeologist. Fencing or signage will establish a 50-foot buffer (at minimum) from the boundary of the cultural resource site. If signs are erected, signage will not indicate that an Environmentally Sensitive Area contains cultural resources. All Environmentally Sensitive Areas will be avoided throughout construction and restoration of the proposed project to the maximum extent feasible. If a 50-foot buffer cannot be established or the areas cannot be avoided, no work will be conducted in the area until a CPUC-approved cultural resources consultant (MM CR-3) inspects the cultural resources. The CPUC-approved cultural resources consultant will communicate the findings to the SCE archaeologist who will make a preliminary determination regarding whether further investigation is required. SCE will then submit their recommendation to the CPUC for the CPUC’s approval. If either SCE’s cultural resources consultant or the CPUC’s cultural resources consultant determines that further investigation is required, work will not be conducted in the area until testing and evaluation (MM CR-8) and, if necessary, data recovery (MM CR-9) are completed. Once construction in proximity to the Environmentally Sensitive Area is complete, the temporary fencing or signage will be removed.</p> |                                 |                                 |
|        | <p><b>MM CR-3: Qualified Cultural Resources Consultants.</b></p>  | <p>Verify qualifications of</p> | <p>During pre-construction.</p> |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements   | Timing   |
|--------|--|---|--|
|        | <p>The applicant will retain the services of qualified professional (CPUC-approved) cultural resources consultants who meet or exceed the U.S. Secretary of the Interior qualification standards for professional archaeologists published in 36 Code of Federal Regulations 61 and who have experience working in the jurisdictions traversed by components of the proposed project sufficient to identify the full range of cultural resources that may be found in the proposed project area. The consultants will also have knowledge of the cultural history of the proposed project area. The resumes and supporting information for each cultural resources consultant will be submitted to the CPUC for approval. At least one qualified cultural resources consultant must be approved by the CPUC prior to start of construction.</p>  | <p>cultural resources consultant.</p>                             |  |
|        | <p><b>MM CR-4: Cultural Resources Plan.</b> Prior to construction, the applicant will submit Cultural Resources Plans for the respective project components, prepared by the approved consultant(s) (MM CR-3) for review and approval by the CPUC. The final Cultural Resources Plans shall be implemented, as specified, throughout construction and restoration. These plans will 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. The monitoring plan applies to all site personnel and shall include, at a minimum:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Brief identification and description of the general range of the resources that may be encountered.</li> <li>• Identification of the elements of a site that will lead to it meeting the definition of a cultural resource requiring protection and mitigation.</li> </ul> | <p>Review adequacy of plan and verify implementation of plan.</p> | <p>During pre-construction, construction, and restoration.</p> |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements   | Timing   |
|--------|---|---|--|
|        | <ul style="list-style-type: none"> <li>• Identification and description of resource mitigation that will be undertaken if required.</li> <li>• Description of monitoring procedures that will take place for each project component area as required.</li> <li>• Description of how often monitoring will occur (e.g., full-time, part time, spot checking).</li> <li>• Description of the circumstances that will result in the halting of work and a statement that either the archaeological monitor or the Native American Monitor is authorized to call for work to be stopped.</li> <li>• Description of the procedures for halting work and notification procedures for construction crews.</li> <li>• Description of procedures for curating any collected materials.</li> <li>• Reporting procedures.</li> <li>• Contact information for those to be notified or reported to.</li> </ul> |   |  |
|        | <p><b>MM CR-5: Native American Consultation and Participation Planning.</b> Prior to construction, the applicant will provide evidence to the CPUC that tribes requesting consultation with the applicant regarding the project design and impacts on cultural resources were consulted at least 30 days prior to construction. In addition, the applicant will provide evidence to the CPUC that tribes that have expressed interest in the project during any phase (i.e., project application through end of construction and restoration) are given the opportunity to participate in additional cultural resources surveys (MM CR-1) and cultural resources monitoring when performed by a CPUC-approved cultural resources consultant (MM CR-3).</p> <p>To outline the expected duties and responsibilities of all parties involved, the applicant and a CPUC-approved cultural</p>         | <p>Verify consultation with interested Native American tribes. Review adequacy of plan and verify implementation of plan.</p> | <p>During pre-construction, construction, and restoration.</p> |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements | Timing |
|--------|---|-------------------------|--------|
|        | <p>resources consultant will submit a Native American Participation Plan prior to construction. The final Native American Participation Plan shall be implemented, as specified, throughout construction and restoration. Tribes that have expressed interest in the project prior to construction will be given the opportunity to participate in development of the plan. At minimum, the plan will specify that:</p> <ul style="list-style-type: none"> <li>• Native American monitors, if approved by a tribe, are expected to participate in worker environmental awareness and health and safety training and follow all health and safety protocols.</li> <li>• Attendance by Native American monitors during construction and restoration of the project is at the discretion of the tribe, and the absence of a Native American monitor, should the tribes choose to forgo monitoring for some reason, will not delay work.</li> <li>• The Native American monitors will have the ability to notify a CPUC-approved cultural resources consultant who has the authority to temporarily stop work (MM CR-7) if they find a cultural resource that may require recordation and evaluation.</li> <li>• Interpretation of a find will be requested from Native American monitors will have the opportunity to provide interpretation on the discovery, evaluation, or data recovery of unanticipated finds for inclusion in the final Cultural Resources Report (MM CR-10).</li> <li>• The tribes involved with preparation of the Native American Participation Plan will be given the opportunity to participate in the development of Testing and Evaluation Plans (MM CR-8) and Data Recovery Plans (MM CR-9) if the development of these plans is required.</li> <li>• Native American monitors approved by a tribe for monitoring work on the project will be notified 30</li> </ul> |                         |        |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements   | Timing                                      |
|--------|--|---|---|
|        | <p>days prior to start of construction of the various project components.</p> <ul style="list-style-type: none"> <li>• , SCE, in coordination with the CPUC, will help facilitate a mutually agreeable plan for participation.</li> <li>• Define a process to inform tribes of completed cultural surveys and to provide a copy of the survey to interested tribes.</li> </ul>   |   |   |
|        | <p><b>MM CR-6: Construction Monitoring.</b> Prior to construction, the applicant will retain qualified archaeologists as specified in the Cultural Resources Plans (MM CR-4) to monitor cultural resources mitigation and ground-disturbing activities in culturally sensitive areas during construction and restoration. The archaeological monitors will work under the supervision of the qualified cultural resources consultant unless the consultant serves as monitor, as well. The archaeological monitors' credentials must be submitted to CPUC for approval prior to the notice to proceed. These areas include the Quaternary alluvium, areas adjacent to sites CA-SBA-3587, CA-VEN-58, GANDA-1, and any other resources identified in the Cultural Resources Plan. The qualified archaeologists will attend preconstruction meetings to provide comments and/or suggestions concerning monitoring plans and discuss excavation plans with excavation contractors.</p> | <p>Verify monitoring of ground-disturbing activities in culturally sensitive areas.</p>       | <p>During construction and restoration.</p> |
|        | <p><b>MM CR-7: Stop Work for Unanticipated Cultural Resources Discoveries.</b> In the event that previously unidentified cultural resources are uncovered during implementation of the project, SCE will ensure that ground-disturbing work is halted or diverted from the discovery to another location and will notify the CPUC and the appropriate authorities. The CPUC-approved cultural resources consultant will inspect the discovery and determine whether further investigation is required. If the discovery is significant but can be avoided, and no further impacts will occur, the</p>  | <p>Verify stop work and proper evaluation of unanticipated cultural resource discoveries.</p> | <p>During construction and restoration.</p> |



| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements   | Timing                                      |
|--------|--|---|---|
|        | <p>resource will be documented 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-approved cultural resources consultant, in consultation with and under the direction of the qualified archaeologist, will evaluate the significance of the resource based on eligibility for the CRHR or local registers and implement appropriate measures in accordance with the Cultural Resources Plans.</p>   |   |   |
|        | <p><b>MM CR-8: Testing and Evaluation Plan.</b> If any cultural resource is discovered during construction that cannot be avoided, work in the area of the find will be immediately halted as specified in MM CR-7. A CPUC-approved cultural consultant (MM CR-3) will determine if further investigation is required (MM CR-7). If so, the CPUC-approved cultural consultant will submit a Testing and Evaluation Plan to the CPUC for approval prior to further disturbance of the resource. The final Testing and Evaluation Plan shall be implemented, as specified, throughout construction and restoration. After testing and evaluation is completed, a report documenting the results will be submitted to the CPUC. If avoidance is recommended, the cultural resource will be avoided, to the maximum extent feasible. If avoidance is not possible, a Data Recovery Plan will be developed and implemented (MM CR-9).</p> | <p>Review adequacy of plan and verify implementation of plan.</p> | <p>During construction and restoration.</p> |
|        | <p><b>MM CR-9: Data Recovery Plan.</b> If avoidance of a cultural resource found during project construction that is eligible for listing in the CRHR or local registers or as “unique” archaeological resources pursuant to CEQA is not feasible, a CPUC-approved cultural resources consultant (MM CR-3) (as applicable) will prepare a Data Recovery Plan that outlines the extent of excavation, recovery/salvage, curation, and recordation that will occur. The Data Recovery Plan will be submitted to the CPUC for approval prior to the start of any data recovery work. Data recovery will be completed as specified in the approved Data Recovery Plan prior to</p>   | <p>Review adequacy of plan and verify implementation of plan.</p> | <p>During construction and restoration.</p> |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements    | Timing  |
|--------|---|----------------------------|---|
|        | continuing work within the area of the find.  |                            |   |
|        | <p><b>MM CR-10: Cultural Resources Reporting.</b> Prior to final inspection after construction of project components has been completed, the applicant’s qualified archaeologists as specified in the Cultural Resources Plans will submit reports to the CPUC summarizing all monitoring and mitigation activities and confirming that all mitigation measures have been implemented.</p>  | Review adequacy of report. | During post-construction.                               |
|        | <p><b>MM CR-11: Paleontological Monitoring and Treatment Plan.</b> Prior to start of construction, the applicant will submit a Paleontological Monitoring and Treatment Plan for each project component that is prepared by a CPUC-approved paleontological consultant (MM CR-12) to the CPUC for approval. This plan will be adapted from the Society of Vertebrate Paleontology’s Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010) to specifically address each project component. In addition, the plan will, at minimum:</p> <ul style="list-style-type: none"> <li>• Include a list of personnel to which the plan applies.</li> <li>• Describe the criteria used to determine whether an encountered resource is significant and if it should be avoided or recovered.</li> <li>• Identify construction and restoration impact areas of moderate to high sensitivity for encountering paleontological resources and the shallowest depths at which those resources may be encountered.</li> <li>• Describe methods of recovery, preparation, and analysis of specimens, final curation of specimens at a federally accredited repository, data analysis, and reporting.</li> <li>• Identify areas with moderate to high sensitivity for encountering paleontological resources and the shallowest depths at which those resources may be</li> </ul> | Review adequacy of plan.   | During pre-construction, construction, and restoration. |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements | Timing |
|--------|---|-------------------------|--------|
|        | <p>encountered.</p> <ul style="list-style-type: none"> <li>• Briefly identify and describe the types of paleontological resources that may be encountered.</li> <li>• Identify the elements of a site that will lead to it requiring protection and mitigation and identify mitigation that will apply.</li> <li>• Describe monitoring procedures that will take place for each component of the project that requires monitoring.</li> <li>• Describe how often monitoring will occur (e.g., full-time, part time, spot checking), as well as the circumstances under which monitoring will be increased or decreased.</li> <li>• Describe the circumstances that will result in the halting of work.</li> <li>• Describe the procedures for halting work and notification procedures for construction and restoration crews.</li> <li>• Describe procedures for curating any collected materials.</li> <li>• Outline coordination strategies to ensure that CPUC-approved paleontological consultant (MM CR-12) conduct full-time monitoring of all grading activities in sediments determined to have a moderate to high sensitivity.</li> <li>• Include reporting procedures.</li> <li>• Include contact information for those to be notified or reported to.</li> </ul> <p>For sediments of low or undetermined sensitivity, the plan will specify what level of monitoring is necessary. Sediments with no sensitivity will not require paleontological</p> |                         |        |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements                | Timing  |
|--------|--|--|---|
|        | <p>monitoring. The plan will define specific conditions in which monitoring of earthwork activities could be reduced and/or depth criteria established to trigger monitoring. These factors will be defined by an approved (MM CR-12) paleontologist.</p>  |  |   |
|        | <p><b>MM CR-12: Qualified Paleontological Consultants.</b> The applicant will retain the services of qualified professional paleontological consultants with knowledge of the local paleontology and the minimum levels of experience and expertise as defined by the Society of Vertebrate Paleontology’s Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010). The resumes and supporting information for each paleontological consultant will be submitted to the CPUC for approval. At least one qualified paleontological consultant must be approved by the CPUC prior to start of construction.</p>   | <p>Review adequacy of consultants.</p> | <p>During pre-construction, construction, and restoration</p> |
|        | <p><b>MM CR-13: Paleontology Construction Monitoring.</b> Based on the Paleontological Monitoring and Treatment Plans, SCE will conduct paleontological monitoring using CPUC-approved paleontological consultant (MM CR-12). This will include monitoring any ground-disturbing activity during construction and restoration 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-approved paleontological consultant.</p>  | <p>Review adequacy of monitoring.</p>  | <p>During pre-construction, construction, and restoration</p> |
|        | <p><b>MM CR-14: Stop Work for Unanticipated Paleontological Discoveries.</b> If previously unidentified paleontological resources are uncovered during implementation of the project, the applicant will ensure that ground-disturbing work is halted or diverted from the discovery to another location. A CPUC-approved paleontological consultant will inspect the discovery and determine whether further investigation is required. If the discovery is significant but can be avoided, and no further impacts will occur, the resource will be documented in the appropriate paleontological resource records and no further effort will be required. If the resource is significant but cannot be avoided and may be subject to</p> | <p>Review adequacy of monitoring.</p>  | <p>During pre-construction, construction, and restoration</p> |

| Impact   | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements   | Timing   |
|--|---|---|--|
|  | <p>further impact, the CPUC-approved paleontological consultant (MM CR-12) will evaluate the significance of the resource and implement appropriate measures in accordance with the Paleontological Monitoring and Treatment Plans.</p> <p><b>MM CR-15: Cultural and Paleontological Resources Training Requirements.</b> Prior to start of construction, all construction and restoration personnel involved in ground-disturbing activities and the supervision of such activities will undergo worker environmental awareness training. The cultural and paleontological resources training components of will be presented by a CPUC-approved cultural resources consultant (MM CR-3) and CPUC-approved paleontological consultant (MM CR-12). The training will describe the role of cultural and paleontological resources monitors; role of Native American monitors (if applicable); the types of cultural and paleontological resources that may be found in the proposed project area and how to recognize such resources; the protocols to be followed if cultural or paleontological resources are found, including communication protocols; and the laws relevant to the protection of cultural and paleontological resources and the associated penalties for breaking these laws. Additionally, prior to construction, CPUC-approved cultural and paleontological resources consultants will meet with the applicant’s grading and excavation contractors to provide comments and suggestions concerning monitoring plans and to discuss excavation and grading plans.</p> | <p>Review adequacy of training materials and verify implementation of training.</p> | <p>During pre-construction, construction, and restoration.</p> |
| <p><i>Impact CR-2: Substantial adverse change in the significance of an archaeological resource.</i></p> | <p><b>APM CUL-1: Avoidance, Minimization, and Mitigation.</b> See above.</p> <p><b>APM CUL-3:</b> See above.</p> <p><b>MM CR-1: Additional Cultural Resources Surveys.</b> See above.</p> <p><b>MM CR-2: Avoid Known Cultural Resources.</b> See above.</p> <p><b>MM CR-3: Qualified Cultural Resources Consultants.</b> See above.</p> <p><b>MM CR-4: Cultural Resources Plan.</b> See above.</p>  |   |  |

| Impact  | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements   | Timing  |
|---|---|---|---|
|   | <p><b>MM CR-5: Native American Consultation and Participation Planning.</b> See above.</p> <p><b>MM CR-6: Construction Monitoring.</b> See above.</p> <p><b>MM CR-7: Stop Work for Unanticipated Cultural Resources Discoveries.</b> See above.</p> <p><b>MM CR-8: Testing and Evaluation Plan.</b> See above.</p> <p><b>MM CR-9: Data Recovery Plan.</b> See above.</p> <p><b>MM CR-10: Cultural Resources Reporting.</b> See above.</p> <p><b>MM CR-15: Cultural and Paleontological Resources Training Requirements.</b> See above.</p>  |   |   |
| <p><i>Impact CR-3: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.</i></p> | <p><b>APM CUL-2: Paleontological Resources Management Plan (PRMP).</b> SCE shall prepare and implement a PRMP that would include, but not be limited to: preconstruction coordination; recommended monitoring methods; emergency discovery procedures; sampling and data recovery methods, if needed; museum storage coordination for any specimens and data recovered; and reporting requirements. The PRMP would also provide for sediment screening, fossil preparation, curation, and preparation of a report detailing the results of the work.</p> <p>In addition, the PRMP would specify monitoring requirements such as the presence of a paleontological monitor when work is being performed at formations with high paleontological sensitivity. If very few or no fossil remains are found during ground-disturbing activities, monitoring time can be reduced or suspended entirely, per recommendations of the paleontological field supervisor.</p> <p><b>MM CR-11: Paleontological Monitoring and Treatment Plan.</b> Prior to start of construction, the applicant will submit a Paleontological Monitoring and Treatment Plan for each project component that is prepared by a CPUC-approved paleontological consultant (MM CR-12) to the CPUC for approval. This plan will be adapted from the Society of Vertebrate Paleontology’s Standard</p> | <p>Review adequacy of plan and verify implementation of plan.</p> <p>Review adequacy of plan and verify implementation of plan.</p> | <p>During pre-construction, construction, and restoration.</p> <p>During pre-construction, construction, and restoration.</p> |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements | Timing |
|--------|---|-------------------------|--------|
|        | <p>Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010) to specifically address each project component. In addition, the plan will, at minimum:</p> <ul style="list-style-type: none"> <li>• Include a list of personnel to which the plan applies.</li> <li>• Describe the criteria used to determine whether an encountered resource is significant and if it should be avoided or recovered.</li> <li>• Identify construction and restoration impact areas of moderate to high sensitivity for encountering paleontological resources and the shallowest depths at which those resources may be encountered.</li> <li>• Describe methods of recovery, preparation, and analysis of specimens, final curation of specimens at a federally accredited repository, data analysis, and reporting.</li> <li>• Identify areas with moderate to high sensitivity for encountering paleontological resources and the shallowest depths at which those resources may be encountered.</li> <li>• Briefly identify and describe the types of paleontological resources that may be encountered.</li> <li>• Identify the elements of a site that will lead to it requiring protection and mitigation and identify mitigation that will apply.</li> <li>• Describe monitoring procedures that will take place for each component of the project that requires monitoring.</li> <li>• Describe how often monitoring will occur (e.g., full-time, part time, spot checking), as well as the circumstances under which monitoring will be increased or decreased.</li> <li>• Describe the circumstances that will result in the halting of work.</li> <li>• Describe the procedures for halting work and</li> </ul> |                         |        |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements   | Timing   |
|--------|--|---|--|
|        | <p>notification procedures for construction and restoration crews.</p> <ul style="list-style-type: none"> <li>• Include testing and evaluation procedures for resources encountered.</li> <li>• Describe procedures for curating any collected materials.</li> <li>• Outline coordination strategies to ensure that CPUC-approved paleontological consultant (MM CR-12) conduct full-time monitoring of all grading activities in sediments determined to have a moderate to high sensitivity.</li> <li>• Include reporting procedures.</li> <li>• Include contact information for those to be notified or reported to.</li> </ul> <p>For sediments of low or undetermined sensitivity, the plan will specify what level of monitoring is necessary. Sediments with no sensitivity will not require paleontological monitoring. The plan will define specific conditions in which monitoring of earthwork activities could be reduced and/or depth criteria established to trigger monitoring. These factors will be defined by an approved (MM CR-12) paleontologist.</p> |   |  |
|        | <p><b>MM CR-12: Qualified Paleontological Consultants.</b> The applicant will retain the services of qualified professional paleontological consultants with knowledge of the local paleontology and the minimum levels of experience and expertise as defined by the Society of Vertebrate Paleontology’s Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010). The resumes and supporting information for each paleontological consultant will be submitted to the CPUC for approval. At least one qualified paleontological consultant must be approved by the CPUC prior to start of construction.</p>   | <p>Verify qualifications of paleontological consultant.</p>       | <p>During pre-construction.</p>                                |
|        | <p><b>MM CR-13: Paleontology Construction Monitoring.</b> Based on the Paleontological Monitoring and Treatment Plans, SCE will conduct paleontological monitoring using CPUC-</p>   | <p>Review adequacy of plan and verify implementation of plan.</p> | <p>During pre-construction, construction, and restoration.</p> |



| Impact   | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements  | Timing                               |
|--|---|--|--------------------------------------|
|  | approved paleontological consultant (MM CR-12). This will include monitoring any ground-disturbing activity during construction and restoration 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-approved paleontological consultant.   |  |                                      |
|  | <p><b>MM CR-14: Stop Work for Unanticipated Paleontological Discoveries.</b> If previously unidentified paleontological resources are uncovered during implementation of the project, the applicant will ensure that ground-disturbing work is halted or diverted from the discovery to another location. A CPUC-approved paleontological consultant will inspect the discovery and determine whether further investigation is required. If the discovery is significant but can be avoided, and no further impacts will occur, the resource will be documented in the appropriate paleontological resource records 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-approved paleontological consultant (MM CR-12) will evaluate the significance of the resource and implement appropriate measures in accordance with the Paleontological Monitoring and Treatment Plans.</p> | Verify stop work and proper evaluation of unanticipated paleontological discoveries. | During construction and restoration. |
|  | <p><b>MM CR-15: Cultural and Paleontological Resources Training Requirements.</b> See above.</p>  |  |                                      |
| <p><i>Impact CR-4: Disturb any human remains, including those interred outside of formal cemeteries.</i></p> | <p><b>APM CUL-1: Avoidance, Minimization, and Mitigation.</b> See above.<br/> <b>APM CUL-3:</b> See above.<br/> <b>MM CR-1: Additional Cultural Resources Surveys.</b> See above.<br/> <b>MM CR-2: Avoid Known Cultural Resources.</b> See above.<br/> <b>MM CR-3: Qualified Cultural Resources Consultants.</b> See above.<br/> <b>MM CR-4: Cultural Resources Plan.</b> See above.<br/> <b>MM CR-5: Native American Consultation and</b></p>  |  |                                      |

| Impact  | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements   | Timing                          |
|---|---|---|---------------------------------|
|   | <p><b>Participation Planning.</b> See above.</p> <p><b>MM CR-6: Construction Monitoring.</b> See above.</p> <p><b>MM CR-7: Stop Work for Unanticipated Cultural Resources Discoveries.</b> See above.</p> <p><b>MM CR-8: Testing and Evaluation Plan.</b> See above.</p> <p><b>MM CR-9: Data Recovery Plan.</b> See above.</p> <p><b>MM CR-10: Cultural Resources Reporting.</b> See above.</p>   |   |                                 |
| <b>4.6 Geology, Soils, and Mineral Resources</b>  |   |   |                                 |
| <p><i>Impact GEO-1: Expose people or structures to risk of loss, injury, or death involving rupture of a known earthquake fault.</i></p>                        | <p><b>APM GEO-1:</b> Based on the findings of the geotechnical analysis, the applicant would design project components to minimize the potential for landslides, lateral spreading, subsidence, liquefaction, or collapse. Measures that may be used to minimize impacts could include, but are not limited to, stabilization fills, retaining walls, slope coverings, removal of unstable materials, avoidance of highly unstable areas, construction of pile foundations, ground improvements of liquefiable zones, installation of flexible bus connections, and incorporation of slack in cables.</p> | <p>Verify implementation of recommendations from the geotechnical analysis.</p> | <p>During pre-construction.</p> |
| <p><i>Impact GEO-2: Expose people or structures to the risk of loss, injury, or death involving strong seismic ground shaking.</i></p>                          | <p><b>APM GEO-1:</b> See above.</p>   |   |                                 |
| <p><i>Impact GEO-3: Expose people or structures to the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.</i></p> | <p><b>APM GEO-1:</b> See above.</p>   |   |                                 |

| Impact  | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements  | Timing  |
|---|--|--|---|
| <i>Impact GEO-4: Expose people or structures to the risk of loss, injury, or death involving landslides.</i>  | <p><b>APM GEO-1:</b> See above.</p> <p><b>MM GEO-1:</b> During operations, the applicant will conduct annual, or more often as needed maintenance patrols to identify areas of active slope instability and submit an annual report to the CPUC. Any areas of slope instability that could potentially affect project facilities (e.g., access roads, subtransmission structures, etc.) will be addressed on a case-by-case basis to minimize on- and off-site impacts.</p>  | Review adequacy of annual reports.   | During operation.                                       |
| <i>Impact GEO-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.</i> | <p><b>APM GEO-1:</b> See above.</p> <p><b>MM GEO-1:</b> See above.</p>   |  |   |
| <i>Impact GEO-7: Be located on expansive soil, creating substantial risks to life or property.</i>  | <p><b>APM GEO-1:</b> See above.</p>  |  |   |
| <b>4.7 Greenhouse Gases</b>   |  |  |   |
| No applicable APMs or mitigation measures.  |  |  |   |
| <b>4.8 Hazards and Hazardous Materials</b>  |  |  |   |
| <i>Impact HZ-1: Significant hazard from routine transport, use, or disposal of hazardous materials.</i>   | <p><b>APM GEN-1:</b> The applicant would develop a Worker Environmental Awareness Plan. The applicant would also prepare a presentation used to train all site personnel prior to the commencement of work. A record of all trained personnel would be kept.</p> <p>In addition to instruction on compliance with APMs and any mitigation measures identified, all construction personnel would also receive the following:</p> <ul style="list-style-type: none"> <li>• A list of phone numbers for the applicant’s environmental specialist personnel associated with the proposed project (archaeologist, biologist, environmental compliance coordinator, and regional spill response</li> </ul> | Review adequacy of training materials and verify implementation of training. | During pre-construction, construction, and restoration. |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements | Timing |
|--------|--|-------------------------|--------|
|        | <p>coordinator).</p> <ul style="list-style-type: none"> <li>• Instruction on the Santa Barbara County APCD and Ventura County APCD fugitive dust rules.</li> <li>• Instruction on biological resources (including special-status species and other sensitive habitats and resources that could occur in the vicinity of the proposed project); the locations of sensitive resources; the legal status and protection afforded these species; and the measures to be implemented for avoidance and minimization of impacts to the resources. Penalties for violations of environmental laws will also be incorporated into the training.</li> </ul>   |                         |        |
|        | <ul style="list-style-type: none"> <li>• A review of applicable local, state, and federal ordinances, laws, and regulations pertaining to historic preservation; a discussion of disciplinary and other actions that could be taken against persons violating historic preservation laws and the applicant policies; a review of archaeology, history, prehistory, Native American cultures, and paleontological resources in the proposed project vicinity; and instruction regarding what typical cultural resources look like.</li> <li>• Instruction regarding the procedures to be implemented should unanticipated cultural resources (as well as paleontological resources) be encountered during construction activities, including stopping work in the vicinity of the find and contacting the archaeologist or environmental compliance coordinator, who would provide guidance on how to proceed.</li> <li>• Instruction regarding the importance of maintaining a clean construction site, including ensuring that all food scraps, wrappers, food containers, cans, bottles, and other trash from the proposed project are deposited in closed trash containers. Trash containers would be removed from the project area as required and would not be permitted to overfill.</li> <li>• Instruction regarding the individual responsibilities under the Clean Water Act, the project SWPPP, site-specific</li> </ul> |                         |        |

| Impact   | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements                                    | Timing  |
|--|---|--|---|
|  | <p>BMPs, and the location of Material Safety Data Sheets for the proposed project.</p> <ul style="list-style-type: none"> <li>• Instructions to notify the foreman and regional spill response coordinator in case of a hazardous materials spill or leak from equipment, or upon the discovery of soil or groundwater contamination.</li> <li>• A copy of the truck routes to be used for material delivery.</li> <li>• Instruction that noncompliance 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.</li> </ul>   |  |   |
| <i>Impact HZ-2: Significant hazard from accident conditions involving the release of hazardous materials.</i>  | <b>APM GEN-1:</b> See above.  |  |   |
| <i>Impact HZ-3: Emit hazardous emissions or involve handling hazardous materials, substances, or waste within one-quarter miles of an existing or proposed school.</i> | <b>APM GEN-1:</b> See above.  |  |   |
| <i>Impact HZ-4: Be located on a site that is included on a list of hazardous materials sites.</i>  | <p><b>MM HZ-1: Contaminated Soil/Groundwater Contingency Plan.</b> The applicant will submit a Contaminated Soil/Groundwater Contingency Plan prior to start of construction to address unanticipated unearthing or exposure of buried hazardous materials or contamination or contaminated groundwater. The final Contaminated Soil/Groundwater Contingency Plan shall be implemented, as specified, throughout construction and restoration. This plan will detail steps that the applicant or its contractor will take to prevent the spread of contamination, the sampling necessary if contamination is discovered, and remedial action. At minimum, the plan will include the following:</p> <ol style="list-style-type: none"> <li>1. Contact information and procedures for federal, regional, and local agencies; the applicant's</li> </ol> | Review adequacy of plan and verify implementation of plan. | During pre-construction, construction, and restoration. |

| Impact  | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements   | Timing   |
|---|---|---|--|
|   | <p>environmental coordinator(s) responsible for the cleanup of contaminated soil or groundwater; and licensed disposal facilities and haulers.</p> <p>2. Procedures to minimize environmental impacts in the event that hazardous soils or other materials are encountered during construction, including stopping work; securing and marking the contaminated area; preventing the spread of contamination; testing; primary, secondary, and final cleanup procedures; and proper disposal in accordance with applicable laws and regulations.</p> <p>3. Training requirements for construction workers performing excavation activities and identifying potentially hazardous contamination (e.g., stained or discolored soil and odor).</p>  |   |  |
| <p><i>Impact HZ-7: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.</i></p> | <p><b>MM TT-1: Traffic Control Plan.</b> See below.</p>   |   |  |
| <p><i>Impact HZ-7: Expose people or structures to a significant risk involving wildland fires.</i></p>  | <p><b>MM HZ-2: Fire Control and Emergency Response Plan.</b> Prior to construction, the applicant will develop and implement a Fire Control and Emergency Response Plan. The final Fire Control and Emergency Response Plan shall be implemented, as specified, throughout construction and restoration. This plan, and a record of contact and coordination with local fire departments, will be submitted to the CPUC for review and approval prior to construction of the proposed project. The plan will describe fire prevention and response practices that the applicant will implement during construction and operation of the proposed project to minimize the risk of fire and, in the case of fire, provide for immediate suppression and notification. The plan will include:</p> <ul style="list-style-type: none"> <li>• Fire prevention and response practices regarding the dispensing and storage of gasoline, diesel, and other</li> </ul> | <p>Review adequacy of plan and verify implementation of plan.</p> | <p>During pre-construction, construction, and restoration.</p> |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements | Timing |
|--------|--|-------------------------|--------|
|        | <p>fuels and combustible chemicals; power tool and equipment use; emergency access; fire suppression equipment and training; electrical grounding; and vegetation clearing; and</p> <ul style="list-style-type: none"> <li>• Communication protocols for on-site workers to coordinate with local agencies and emergency personnel and for the applicant’s environmental health and safety personnel to coordinate with on-site workers in the event of fire, flood, or other emergencies or increased risk of emergency during construction or operation of the project.</li> </ul> <p>The plan will define requirements for:</p> <ul style="list-style-type: none"> <li>• Contacting CALFIRE at least two days prior to periods during which helicopters would be used to provide radio frequencies to be used by the helicopters; helicopter identifier data; and information about the number of helicopters to be used, dates of helicopter use, helicopter flight patterns, construction areas where helicopters would be used, and fueling and landing areas;</li> <li>• Designating on-site fire patrol personnel who will monitor fire prevention activities during construction and have full authority to stop construction to prevent fire hazards;</li> <li>• Reviewing the Fire Control and Emergency Response Plan with designated on-site fire patrol personnel and all other workers prior to commencing construction at each project area;</li> <li>• Confining welding or blow torch activities to cleared areas having a minimum radius of 10 feet, measured from place of welding. If welding or blow torch activities occur within the right-of-way of the transmission or subtransmission line within High or Very High Fire Hazard Severity Zones as defined by CALFIRE, a fire patrol person will observe the operation;</li> </ul> |                         |        |

| Impact   | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements | Timing |
|--|---|-------------------------|--------|
|  | <ul style="list-style-type: none"> <li>• Prohibiting smoking at all work areas within High and Very High Fire Hazard Severity Zones as defined by CALFIRE during construction and operation of the project;</li> <li>• Ensuring that all vehicles used for construction and operation of the project carry fire suppression equipment;</li> <li>• The use of spark arrestors;</li> <li>• Furnishing tools (e.g., shovels), equipment (e.g., fire extinguishers), and materials necessary to prevent fires, control the spread of fire if started, and providing assistance to extinguish fires started as a result of construction of the project;</li> <li>• Providing the applicant’s workforce and equipment to extinguish uncontrolled fire near project work areas as directed by the USFS, CALFIRE, or local fire department representatives; and</li> <li>• Ceasing any or all work activities, including helicopter use, as directed by the USFS, CALFIRE, or local fire department representatives in response to fire incidents.</li> </ul> |                         |        |
| <b>4.9 Hydrology and Water Quality</b>   |   |                         |        |
| <i>Impact HY-1: Violate water quality standards.</i>   | <b>APM BIO-7:</b> See above.<br><b>APM GEO-1:</b> See above.  |                         |        |
| <i>Impact HY-6: Other substantial degradation of water quality.</i>                                    | <b>APM BIO-7:</b> See above.  |                         |        |
| <i>Impact HY-9: Risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow.</i> | <b>APM GEO-1:</b> See above.  |                         |        |
| <b>4.10 Land Use and Planning</b>  |   |                         |        |
| No applicable APMs or mitigation measures.   |   |                         |        |
| <b>4.11 Noise</b>  |   |                         |        |



| Impact   | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements   | Timing                                      |
|--|---|---|---|
| <p><i>Impact NS-1: Noise levels in excess of standards established in the local general plan or noise ordinance.</i></p> | <p><b>APM NV-1:</b> Construction activities will be conducted or phased to ensure that noise generated during construction would not exceed thresholds or durations identified by the City of Carpinteria Resolution No. 408; the County of Ventura noise regulations set forth in the County’s Construction Noise Criteria and Control Plan; or the County of Santa Barbara Environmental Thresholds and Guidelines Manual.</p>  | <p>Verify noise levels.</p>   | <p>During construction and restoration.</p> |
|  | <p><b>APM NV-2:</b> Equipment and trucks used for the proposed project shall employ the best available noise control techniques to the extent feasible.</p>   | <p>Verify utilization of noise control techniques on construction equipment and trucks.</p> | <p>During construction and restoration.</p> |
|  | <p><b>MM NV-1: Noise Reduction and Control Practices.</b> The applicant will employ a combination of the following noise reduction and control practices during the proposed 66-kV subtransmission line, telecommunication route installation, and substation work to ensure that the temporary increase in ambient noise will not exceed maximum allowable levels identified by the applicable jurisdiction, measured at the closest sensitive receptor property boundary:</p> <ul style="list-style-type: none"> <li>• Construction equipment, stationary or mobile, will be equipped with properly operating and maintained mufflers on engine exhausts and compressor components.</li> <li>• The number and duration of construction equipment and vehicle idling on site will be limited, in accordance with APM AQ-2.</li> <li>• Temporary acoustic barriers or sound curtains (e.g., removable blankets or curtains made of composite materials that block and absorb noise) will be used along the perimeter wall of work areas as needed to reduce noise when construction activities occur within 200 feet of a sensitive receptor at any single location or within 1,600 feet of sensitive receptors for activities lasting more than 3 consecutive days at</li> </ul> | <p>Verify implementation of measures.</p>   | <p>During construction and restoration.</p> |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements | Timing |
|--------|---|-------------------------|--------|
|        | <p>a single location. Noise barriers or sound curtains will be selected with a sound transmission class of 30 or greater, in accordance with American Society for Testing and Materials Test Method E90. The noise absorbing material will be 2-inches thick and have a Noise Reduction Coefficient rating of 0.85 or greater, based on American Society for Testing and Material Method C423. The barrier height will be designed to break the line of sight and provide at least a 5-dBA insertion loss between the noise source and the closest sensitive receptor.</p> <ul style="list-style-type: none"> <li>• Helicopter use during 66-kV subtransmission and overhead telecommunication line installations will avoid flying below 1,000 feet over sensitive receptors, when feasible. If helicopter use is required below 1,000 feet over sensitive receptors, the applicant will notify affected parties at least 48 hours prior to helicopter use.</li> <li>• Prior to the start of construction, the applicant shall prepare a Noise Control Plan for the construction of the proposed project. The applicant shall submit the Noise Control Plan to the CPUC at least 30 days prior to the start of construction for review and approval. The Noise Control Plan shall detail the frequency, location and methodology for noise monitoring prior to and during various construction activities to ensure that generated noise levels do not exceed the maximum allowable levels identified by the applicable jurisdiction.</li> </ul> |                         |        |

| Impact   | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements   | Timing                                      |
|--|---|---|---|
| <p><i>Impact NS-4: Substantial temporary or periodic increase in ambient noise levels in the project vicinity.</i></p>   | <p><b>APM NV-1:</b> See above.<br/><b>APM NV-2:</b> See above.<br/><b>APM NV-3:</b> Stationary sources shall be located as far from adjacent noise-sensitive receptors as reasonably possible and shall be enclosed if feasible.</p>  | <p>Verify placement of stationary noise sources.</p>              | <p>During construction and restoration.</p> |
|  | <p><b>APM NV-4:</b> Where feasible, temporary portable sound barriers would be deployed where construction noise would cause noise levels at sensitive receptor locations to be in excess of an applicable criteria threshold. For purposes of this APM, schools would only be considered sensitive receptor locations during instruction hours.</p>  | <p>Verify proper use of sound barriers.</p>                       | <p>During construction and restoration.</p> |
|  | <p><b>APM NV-5:</b> At least two weeks prior to the anticipated start of construction at a particular location, the applicant will notify all property owners within 300 feet of that location that construction activities are about to commence at that location.</p>   | <p>Verify property owner notification.</p>                        | <p>During pre-construction.</p>             |
|  | <p><b>MM NV-1: Noise Reduction and Control Practices.</b> See above.</p>  |   |   |
| <p><b>4.12 Population and Housing</b></p>  |   |   |   |
| <p>No applicable APMs or mitigation measures.</p>  |   |   |   |
| <p><b>4.13 Public Services and Utilities</b></p>   |   |   |   |
| <p><i>Impact PS-1: Result in substantial adverse physical impacts associated with new or physically altered governmental facilities.</i></p>                             | <p><b>MM HZ-2:</b> See above.</p>   |   |   |
| <p><i>Impact PS-3: Insufficient water supplies available to serve the project from existing entitlements and resources or new or expanded entitlements required.</i></p> | <p><b>MM PS-1: Water Efficiency Plan.</b> The applicant will make reasonable attempts to reduce overall water use and will reduce potable water use by at least 20 percent during drought conditions as declared by the State of California. The applicant will be required to research reclaimed water sources and acquire reclaimed water to the greatest extent practicable. The applicant will prepare and submit a Water Efficiency Plan to the CPUC for review and approval at least 60 days prior to construction. The Water Efficiency Plan will detail</p> | <p>Review adequacy of plan and verify implementation of plan.</p> | <p>During construction and restoration.</p> |

| Impact  | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements   | Timing                                      |
|---|---|---|---|
|   | <p>the applicant’s water efficiency measures, including the use of reclaimed water, palliatives, alternative construction methods, or other measures proposed by the applicant. The Water Efficiency Plan will detail the applicant’s attempts to secure reclaimed water. In the event that a sufficient supply of reclaimed water cannot be reasonably obtained, the applicant will provide a well-documented justification for any use of potable water to be used for construction activities. If, at any time during construction, the State Water Resources Control Board rescinds their Emergency Regulations (Resolution No. 2014-0038) due to a cessation of drought conditions in the State, the applicant may request that the CPUC rescind this mitigation measure. Alternatively, the applicant will need to revise their Water Efficiency Plan to remain in compliance with future adopted SWRCB regulations regarding water use during drought conditions.</p>  |   |   |
| <p><b><i>Impact PS-6: Exceed Santa Barbara County’s solid waste thresholds of 350 tons of construction and demolition debris.</i></b></p> | <p><b>MM PS-2: Solid Waste Management Plan.</b> The applicant will prepare and submit a Solid Waste Management Plan to the CPUC for review and approval prior to the start of construction. The County of Santa Barbara and the County of Ventura will also be provided the opportunity to review and provide comments on the plan. Santa Barbara County must approve plan language that relates to areas within its jurisdiction prior to project activities within the Santa Barbara Coastal Development Zone. The Solid Waste Management Plan will outline how the applicant will sort, measure, and record the disposal of solid waste to ensure that no more than 350 tons of solid waste is delivered to a Santa Barbara County operated solid waste disposal facility and that at least 60% (by weight) of construction debris will be diverted through either reuse or recycling. Measures in the plan will include, but will not be limited to:</p> <ul style="list-style-type: none"> <li>• Provision of space and/or bins for appropriate storage of recyclable materials on site;</li> <li>• Establishment of a recyclable material pickup area; and</li> <li>• Development of a recordation system that details the</li> </ul> | <p>Review adequacy of plan and verify implementation of plan.</p> | <p>During construction and restoration.</p> |

| Impact  | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements   | Timing                                      |
|---|--|---|---|
|   | <p>amount of solid waste created, solid waste recycled (including soil recycling), and solid waste delivered to each solid waste disposal facility.</p> <p>The plan will also detail reporting requirements to the CPUC, Santa Barbara County, and Ventura County. Reporting will include biannual progress reports as well as notification to Santa Barbara County if the project's capacity at Santa Barbara County operated solid waste disposal facilities is reached.</p>   |   |   |
| <b>4.14 Recreation</b>  |  |   |   |
| <p><b>Impact RE-2: Would the project disrupt access to existing recreation opportunities.</b></p> | <p><b>MM RE-1: Notification of Trail Closure.</b> The applicant shall provide users of the Ojai Valley Trail and the Franklin Trail with at least one week notice of expected trail closures and/or detours. The applicant shall coordinate with the City of Carpinteria Parks and Recreation Department, the County of Ventura Parks Department, the Santa Barbara County Parks Department, and the Land Trust for Santa Barbara County for their respective parks, to determine appropriate locations to post notifications, such as trailhead kiosks, access points, or the departments' websites. Notifications that are posted outside shall be protected from general weather conditions. Notifications shall include the following minimum information:</p> <ul style="list-style-type: none"> <li>• The date the notification is posted;</li> <li>• General description of activities that are causing the closure;</li> <li>• Description (or map) of areas that will be affected by the closure;</li> <li>• The date (or date range) and time range that temporary closures will occur;</li> <li>• Approximate length of closure (i.e., will it be a series of 30 minute closures, or one 8-hour closure); and</li> <li>• Description (or map) of detour directions, if applicable.</li> </ul> | <p>Verify notification includes appropriate information and are posted on time, and remain in good condition.</p> | <p>During construction and restoration.</p> |

| Impact  | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements   | Timing   |
|---|--|---|--|
|   | <p>The applicant shall provide a copy of the trail closure notification to the City of Carpinteria Parks and Recreation Department and the County of Ventura Parks Department, for their respective parks, and the CPUC on the same day that the notice is posted. The applicant shall regularly confirm that notifications remain posted and in good condition throughout the affected timeline.</p>  |   |  |
| <b>4.15 Transportation and Traffic</b>  |  |   |  |
| <p><i>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.</i></p> | <p><b>MM TT-1: Traffic Control Plan.</b> The applicant shall prepare Traffic Control Plan in accordance with the latest version of the California Joint Utility Traffic Control Manual prior to commencement of construction activities (California Inter-Utility Coordinating Committee 2010). The final Traffic Control Plan shall be implemented, as specified, throughout construction. The Traffic Control Plan shall be developed to minimize short-term construction-related impacts on local traffic (including motorists, bicyclists, and pedestrians) and potential traffic safety hazards, and shall include measures such as the installation of temporary warning signs at strategic locations near access locations for the project components. The signs shall be removed after construction-related activities are completed. The Traffic Control Plan would include, at a minimum, the measures listed below. The draft Traffic Control Plan shall be submitted to the regional office of the California Department of Transportation and applicable local jurisdictions for review and comment at least 60 days prior to the start of construction. The applicant shall address all agency comments prior to distributing the final Traffic Control Plan to all construction crew members and prior to commencement of construction activities. Specifically, the Traffic Control Plan would include the following:</p> <ul style="list-style-type: none"> <li>• Installation of traffic control devices as specified in the California Joint Utility Traffic Control Manual;</li> <li>• Include a discussion of work hours, haul routes,</li> </ul> | <p>Review adequacy of plan and verify implementation of plan.</p> | <p>During pre-construction, construction, and restoration.</p> |

| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)   | Monitoring Requirements | Timing |
|--------|--|-------------------------|--------|
|        | <p>work area delineation, traffic control and flagging;</p> <ul style="list-style-type: none"> <li>• Identify all access and parking restriction and signage requirements;</li> <li>• Require workers to park personal vehicles at approved staging areas and take only necessary project vehicles to the work sites;</li> <li>• Coordination with the City of Carpinteria, Carpinteria-Summerland Fire District, City of Ventura, County of Santa Barbara, or County of Ventura on any temporary land or road closures within their jurisdictions. Layout plans for notifications and a process for communication with affected residents and landowners prior to the start of construction. Advance public notification shall include posting of notices and appropriate signage of construction activities. The written notification shall include the construction schedule, the exact location and duration of activities within each street (i.e., which roads/lanes and access point/driveways/parking areas would be blocked on which days and for how long), and a toll-free telephone number for receiving questions or complaints;</li> <li>• To ensure that the Traffic Control Plan reduces traffic impacts related to temporary lane closures along SR-192, SR-150, SR-33, the applicant will confer with the affected jurisdiction’s traffic engineers and incorporate the engineer’s recommendations into the Traffic Control Plan prior to commencing work;</li> <li>• The Traffic Control Plan would also be submitted to all affected jurisdictions for review and approval prior to conducting construction activities;</li> <li>• Provisions for temporary alternate routes to route</li> </ul> |                         |        |

| Impact  | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements  | Timing   |
|---|---|--|--|
|   | <p>local traffic around construction zones;</p> <ul style="list-style-type: none"> <li>• Delivery activities requiring extensive street use and temporary lane closures and/or lane reductions would be scheduled to occur during the off-peak hours to the extent feasible;</li> <li>• Emergency service providers would be notified of the timing, location, and duration of construction activities. All roads would remain passable to emergency service vehicles at all times; and</li> <li>• Identify all roadway locations where special construction techniques (e.g. night construction) would be used to minimize impacts to traffic flow.</li> </ul>   |  |  |
| <p><i>Impact TT-3: Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.</i></p> | <p><b>MM TT-2: Helicopter Safety Plan and External-Load Training.</b> Prior to start of construction, the CPUC must approve a Helicopter Safety Plan developed by SCE or its contractors if helicopters are to be used for any aspect of construction of the project. All workers that shall be present when helicopters are in use for construction of the project shall be trained regarding helicopter external loads. A sign-in sheet recording the names and dates of all individuals trained shall be maintained by SCE. Helicopter Safety Plan and Worker Environmental Awareness training shall include the following, at minimum:</p> <ul style="list-style-type: none"> <li>• An overview of the general steps taken by the certified Rotorcraft External-Load Operators before starting operations, including a survey of the flight area; the typical ground worker instructions from certified Rotorcraft External-Load Operators; the ramp inspection checklist (14 CFR 133 Ramp Inspection Job Aid) and examples of typical causes of unsatisfactory ramp inspections; and the equipment typically required for Class A, B, C, and D loads as specified in 14 CFR 133;</li> <li>• A summary of the contents of the FAA-approved Rotorcraft Load Combination Flight Manuals applicable to external-load operations planned for</li> </ul> | <p>Review adequacy of plan and training. Verify implementation of plan and training.</p> | <p>During pre-construction, construction, and restoration.</p> |



| Impact | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements | Timing |
|--------|---|-------------------------|--------|
|        | <p>the project including maximum loads (internal and external) and load types and general performance capabilities, under approved operating procedures and limitations, for each type of helicopter to be used;</p> <ul style="list-style-type: none"> <li>• Detailed instruction regarding the proper methods of loading, rigging, or attaching external loads and examples of improper rigging and resultant accidents and incidents; and</li> <li>• Detailed information about planned helicopter construction techniques.</li> </ul> <p>A safety brief, plan of operations, and refresher helicopter external-load operations training shall occur at the start of all days during which helicopter external-load operations are planned to occur. The planned flight paths, landing areas, and timing and types of helicopter construction activities for the day shall be presented. At minimum, the refresher training shall include examples load types and maximum loads (internal and external) for each type of helicopter to be used that day and a demonstration of proper external-load attaching and restraining means for all types of attaching and retraining devices that may be used.</p> <p>No SCE personnel or contractor, including helicopter pilots and crewmembers, shall work in proximity to or be involved with helicopter external-load operations unless they receive the initial training and attend the daily safety brief and refresher training. Signatures of all personnel and contractors that attend the daily safety brief and refresher training shall be collected and clear indication on the worker (e.g., sticker on the hardhat color-coded by training day) shall be visible to indicate that the worker, pilot, or crewperson is approved to work in proximity to or otherwise be involved with helicopter external-load operations for the day. Copies of all sign-in sheets and a list of topics covered during training shall be submitted to the CPUC.</p> |                         |        |

| Impact   | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements   | Timing                                      |
|--|---|---|---|
|  | <p><b>MM TT-3: Notification and Monitoring of Helicopter Use.</b> SCE shall notify the Van Nuys Flight Standards District Office at least one week in advance of all days during which helicopter operations are planned to occur or as required by the Flight Standards District Office. In addition, SCE shall notify all residents, businesses, and owners of property within 0.25 miles of planned or emergency helicopter flight paths and landing areas at least one week in advance of all days during which helicopter operations are planned to occur.</p> <p>In compliance with 14 CFR Part 133, the loading and unloading of all helicopter external loads shall be monitored by lineman (non-apprentice) certified by SCE to rig and inspect helicopter external loads.</p> <p>All accidents or incidents reported to the National Transportation and Safety Board (NTSB) or FAA shall, at the same time of reporting, be reported to the CPUC. Near misses involving helicopters that had the potential to result in an accident or incident as defined by NTSB but do not require NTSB notification, shall be entered and described on a dated record by SCE and immediately reported to the applicant's safety coordinator and the CPUC.</p> | <p>Verify proper notification to Van Nuys Flight Standards District Office and surrounding residents, businesses, and owners of property. Verify monitoring of loading and unloading helicopter operations.</p> | <p>During construction and restoration.</p> |
| <p><i>Impact TT-4: Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).</i></p> | <p><b>MM TT-1: Traffic Control Plan.</b> See above.</p>   |   |   |
| <p><i>Impact TT-5: Result in inadequate emergency access.</i></p>  | <p><b>MM TT-1: Traffic Control Plan.</b> See above.</p>   |   |   |

| Impact  | Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)  | Monitoring Requirements   | Timing   |
|---|---|---|--|
| <p><i>Impact TT-6: Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.</i></p> | <p><b>MM TT-1: Traffic Control Plan.</b> See above.</p> <p><b>MM TT-4: Repair of Damaged Trails.</b> Prior to the start of construction, the applicant shall record the existing conditions of trails that could be physically damaged from the proposed construction activities. At the completion of construction, the applicant shall ensure that damage to existing trails as a direct result of activities related to construction of the proposed project components shall be repaired once construction is complete in accordance with local jurisdiction requirements and/or existing franchise agreements held by the applicant.</p> | <p>Review adequacy of plan and verify implementation of plan.</p> | <p>During pre-construction, construction, and restoration.</p> |

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# **Attachment A**

## **Project and Emergency Contacts**

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# **Attachment B**

## **Site Inspection Form**



## Santa Barbara County Reliability Project CPUC Site Inspection Form

|                    |  |                 |  |
|--------------------|--|-----------------|--|
| Project:           | Santa Barbara County Reliability Project | Date:           |  |
| Project Proponent: | Southern California Edison               | Report #:       |  |
| Lead Agency:       | California Public Utilities Commission   | Monitor(s):     |  |
| CPUC PM:           | Jensen Uchida, Energy Division           | AM/PM Weather:  |  |
| E & E CM:          | Rachel James                             | 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, San Diego desert woodrat, California red-legged frog, southwest willow flycatcher, 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 BIO-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 SCE: Were there any new non-compliance issues reported by SCE monitors since your last visit? If so, describe issues and resolution and include 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**

## **Non Compliance Report Form**



# Santa Barbara County Reliability Project Construction Non-Compliance Report

|                   |       |                           |       |
|-------------------|-------|---------------------------|-------|
| Incident Date:    | _____ | Report No.:               | _____ |
| Date Submitted:   | _____ | Location:                 | _____ |
| Level:            | _____ | Relevant<br>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)                 |      |              |           |          |
| SCE Environmental Compliance Manager (if applicable) |      |              |           |          |

Prepared by: \_\_\_\_\_ Date: \_\_\_\_\_

| Non-compliance Level  | Description  | Example  |
|---|--|--|
| <p>Level 1 (Clarification/Correction Required)<br/>Level 1 should only apply to those actions that do not cause immediate risk to environmental resources.</p>        | <p>Activities that result in a partial implementation of the mitigation measures and require minor clarification of mitigation measures requirements</p>   | <ul style="list-style-type: none"> <li>i. Initial inadvertent failure to implement adequate dust control measures resulting in no impact on resources;</li> <li>ii. Minor inadvertent hazardous material/fuel release resulting in no impact on resources;</li> <li>iii. Improperly installed, repaired, or maintained erosion or sediment control devices (with no resultant harm to sensitive resources or release of sediment to waters);</li> <li>iv. Inadvertent minor incursion into exclusion area resulting in no harm to sensitive biological or cultural resources;</li> <li>v. Use of an existing unapproved access road (first offense);</li> <li>vi. Work outside the approved work limits where the incident is within a previously disturbed area, such as a gravel lot</li> </ul>  |
| <p>Level 2 (Minor Incident)<br/>Level 2 should apply to those actions that have the potential to cause or cause immediate, minor risk to environmental resources.</p> | <p>Activities that result in a deviation from the mitigation measure requirements that result in minor, short-term impacts to resources</p>  | <ul style="list-style-type: none"> <li>i. Work without appropriate permit(s);</li> <li>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);</li> <li>iii. Brush clearing outside the approved work limits with no impacts on sensitive resources;</li> <li>iv. Repeated documentation of Level 1 incidents</li> </ul>  |
| <p>Level 3 (Major Incident)<br/>Level 3 should apply to those actions that have the potential to cause or cause immediate, major risk to environmental resources.</p> | <p>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</p> | <ul style="list-style-type: none"> <li>i. Construction activities occurring in an exclusion zone with direct impacts to sensitive or endangered species, cultural resources, human remains, or an archaeological site;</li> <li>ii. Eminent danger or documented impact to a sensitive or T&amp;E species;</li> <li>iii. Repeated deviations from required mitigation measures/requirements that have been documented as Level 2 (Minor Incidents);</li> <li>iv. Improper installation of erosion or sediment control structures resulting in substantial sedimentation or impacts to water quality or putting sensitive resources at risk;</li> <li>v. Grading, foundation, or line work without required biological preconstruction surveys or a biological monitor on site;</li> <li>vi. Use of new access roads, staging areas, or extra workspaces not identified on the project drawings or approved for use during construction.</li> </ul> |

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# **Attachment D**

## **Minor Project Refinement Form**



# Santa Barbara County Reliability 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 | <input type="checkbox"/> Y<br><input type="checkbox"/> N |   |
| Agency Consultation?           | <input type="checkbox"/> Y <input type="checkbox"/> N    | [Add notes to specify whether agency consultation is necessary, and if so, provide brief summary of that consultation.]   |
| Hazardous Materials and Waste  | <input type="checkbox"/> Y<br><input type="checkbox"/> N |   |
| Agency Consultation?           | <input type="checkbox"/> Y <input type="checkbox"/> N    |   |
| Hydrology                      | <input type="checkbox"/> Y<br><input type="checkbox"/> N |   |
| Agency Consultation?           | <input type="checkbox"/> Y <input type="checkbox"/> N    |   |
| Cultural Resources             | <input type="checkbox"/> Y<br><input type="checkbox"/> N |   |
| Agency Consultation?           | <input type="checkbox"/> Y <input type="checkbox"/> N    |   |
| Traffic and Circulation        | <input type="checkbox"/> Y<br><input type="checkbox"/> N |   |
| Agency Consultation?           | <input type="checkbox"/> Y <input type="checkbox"/> N    |   |
| Air Quality                    | <input type="checkbox"/> Y<br><input type="checkbox"/> N |   |
| Agency Consultation?           | <input type="checkbox"/> Y <input type="checkbox"/> N    |   |
| Noise and Vibration            | <input type="checkbox"/> Y<br><input type="checkbox"/> N |   |
| Agency Consultation?           | <input type="checkbox"/> Y <input type="checkbox"/> N    |   |
| Visual Resources               | <input type="checkbox"/> Y<br><input type="checkbox"/> N |   |
| Agency Consultation?           | <input type="checkbox"/> Y <input type="checkbox"/> N    |   |
| Vegetation and Wildlife        | <input type="checkbox"/> Y<br><input type="checkbox"/> N |   |
| Agency Consultation?           | <input type="checkbox"/> Y <input type="checkbox"/> N    |   |



### 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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