

February 10, 2017

Andrew Barnsdale Project Manager California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

Re: Monthly Report Summary #33 for Aliso Canyon Turbine Replacement Project

Dear Mr. Barnsdale:

This monthly report provides a summary of the compliance monitoring activities that occurred during the period from **December 1 to 31, 2016**, for the Aliso Canyon Turbine Replacement (ACTR) Project (Aliso) in California. Compliance monitoring was performed to ensure that all project-related activities conducted by Southern California Gas Company (SCG), Southern California Edison (SCE), and their contractors are in compliance with the requirements of the Final Environmental Impact Report (Final EIR) for Aliso, as adopted by the California Public Utilities Commission (CPUC) on November 14, 2013, and as further modified in the Addendum to the Final EIR, as approved by the CPUC on December 18, 2014.

The CPUC has issued the following Notices to Proceed (NTPs) for the project to SCG and SCE:

- NTP #1 (February 25, 2014): The Guard House and road widening component.
- NTP #2 (May 27, 2014): Construction of new administrative buildings, removal of old buildings, and development of Fill Sites P-41 and P-43.
- NTP #3 (July 18, 2014): Construction of the Central Compressor Station (CCS), grading for the Natural Substation, and installation of five tubular steel poles (TSPs) and string conductor.
- NTP-A (October 28, 2014): Work along Natural-Newhall-San Fernando and MacNeil-Newhall-San Fernando 66-kilovolt (kV) subtransmission lines and at the San Fernando, Newhall, Chatsworth, Sunshine, and MacNeil substations.
- NTP-B (February 24, 2015): Construction of a portion of Telecommunications Route 3 from the San Fernando Substation to the temporary San Fernando Substation Tap.
- NTP-C (April 14, 2015): Construction and telecommunication installation associated with the MacNeil-Newhall-San Fernando and Natural-Newhall-San Fernando 66-kV subtransmission lines.
- NTP-D (June 8, 2015): Additional construction and telecommunication installation associated with the MacNeil-Newhall-San Fernando and Natural-Newhall-San Fernando 66-kV subtransmission lines, and construction of the Natural Substation.
- NTP-E (September 21, 2015): Additional construction and telecommunication installation on Telecommunications Routes 1, 2, and 3.

Onsite compliance monitoring by the Ecology and Environment, Inc. (E & E) compliance team during this reporting period focused on weekly spot-checks of ongoing construction activities. Compliance Monitor Vince Semonsen visited the Aliso construction site on December 1, 6-7, and 29, 2016. Additionally, CPUC Deputy Compliance Manager Andres Estrada and biologist Jenny Vick visited the Aliso construction site on December 6 and 7, 2016. Site inspection reports that summarize observed construction activities and compliance events and verify mitigation measures (MMs)/applicant proposed measures (APMs) were completed for all site visits. Reports are attached below (Attachment 1).

Overall, the ACTR Project has maintained compliance with the Mitigation Monitoring, Compliance, and Reporting Program's (MMCRP) Compliance Plan. Communication between the CPUC/E & E compliance team and SCG and SCE has been regular and generally effective; correspondence discussed and documented compliance events, upcoming compliance-related surveys and deliverables, and the construction schedule. Regular agency calls between CPUC/E & E, SCG, and SCE, along with weekly email updates from SCG and SCE, provided additional compliance information and construction summaries. Furthermore, SCG's and SCE's monthly compliance status reports for December 2016 provided compliance summaries and included: a description of construction activities from December 1 to 31, 2016; a detailed look-ahead construction schedule; a summary of compliance with project commitments (MMs/APMs) for air quality, biological resources, and cultural and paleontological resources; Storm Water Pollution Prevention Plan (SWPPP) measures; noise measures; the Worker Environmental Awareness Training Program (WEAP); a summary of non-compliance incidents; and a list of recent ACTR Project approvals.

Compliances Incidents

Qualifying Storm Events

During mid to late December 2016, several forecasted qualifying rain events occurred at the storage field. The first of these storms was December 15-16 and SCG reported 2.5 inches of rain. On December 21, 2016, another storm began, which produced 0.95 inch of precipitation over 12 hours. Another storm occurred on December 23-24, 2016. On December 27, 2016, SCG noted an additional 2.4 inches of precipitation, for a total of 3.35 inches over the December 21-27, 2016, time period. Between storms, SCG reported to the CPUC that they had performed site inspections and that sufficient BMPs were installed in project areas.

However, On December 29, 2016, the CPUC Compliance Monitor visited the storage field and reported that erosion had occurred on the 12-kv/TSP-A2 access road and sediment appeared to have traveled off the road and down toward the stream. There was evidence that erosion occurred within the oak swale below the Natural Substation and continued all the way down the 12-kV/TSP-A2 access road. The CPUC Compliance Monitor noted that the access road was badly eroded with deep rills up to 2 feet deep. It appeared that muddy water and sediment then traveled from the access road to the parking area below, across the Limekiln Creek bridge, and to the base of the CCS, where the water ponded. The CPUC Compliance Monitor also noted a large amount of mud had accumulated on the edge of the creek, indicating that muddy water and sediment likely flowed into the creek. See the December 29, 2016 CPUC Site Inspection Report for additional details and documentation (Attachment 1).

In accordance with SCG's National Pollutant Discharge Elimination System (NPDES) General Permit and APM GE-2, proper BMPs must be installed to control erosion and sedimentation. Previous BMP failures at the Natural Substation area are documented in Non-Compliance Reports (NCRs) 3, 4, 8, and 10 and numerous CPUC Monthly Reports (February 2015, March 2015, May 2015, January 2016, February 2016). NCR 10 documented concerns about the amount of water coming from the paved Natural Substation area into the oak swale. While SCG has implemented BMPs to stabilize the Natural Substation area, the large amount of stormwater entering the oak swale from the Natural Substation area is still a concern. Stormwater appears to drop steeply at the base of the oak swale, pick up speed, and run onto the 12-kV/TSP-A2 access road area below. The CPUC Compliance Monitor provided evidence (December 29, 2016 Report, Attachment 1) that the water flowing down and off the 12-kV/TSP-A2 access road likely originated from the oak swale and likely caused erosion and sedimentation off the road. The deep erosion rills on the 12-kV/TSP-A2 access road, the sediment on the road and in the parking area, the sediment below the CCS, and the mud accumulated on the stream bank strongly indicate that the mechanisms in place to control stormwater did not meet the project's required performance standard for APM GE-2. APM GE-2 must be implemented effectively in order to reduce impacts from erosion and sedimentation on biological and hydrological resources to a less than significant level, as required by the MMCRP and as described in the Final EIR.

Other Compliance Incidents

A notice of violation (NOV) was issued to SCG for the ACTR Project on December 13, 2016, by an LA County Inspector for NPDES correction. The inspector noted the presence of track-out and the need for stabilization/maintenance of an eroded slope immediately adjacent to the northwest corner of the new Admin/IM Building. SCG noted that the eroded area was outside of the ACTR Project footprint. SCG addressed both issues. The inspector returned to the site on December 22, 2016, and was satisfied with the repairs/maintenance undertaken. The CPUC was notified of the NOV on December 22, 2016.

Special Status Species Observations

Nine live California newt, a California Department of Fish and Wildlife (CDFW)-designated Species of Special Concern, were observed during December 2016; all newts were relocated out of harm's way. Five dead newts were documented during December 2016. The dead newts were collected in accordance with CDFW requested protocol.

Public Concerns

There were no public concerns during December 2016.

Minor Approvals

During December 2016, one email approval was issued (Table 1).

Table 1: Minor Approvals for November 2016

Description	Approval Date
Email approval to perform nitrogen testing/purging of pipeline structures at the CCS during day and night shifts and perform the night work without an environmental monitor (SCG).	December 5, 2016

Please contact me if you have any questions concerning this summary report.

Sincerely,

Lara Rachowicz

Lara Rachowicz

Project Manager, Ecology and Environment, Inc.

cc:

Derek Rodgers, SCG Chris May, SCE

ATTACHMENT 1

CPUC Site Inspection Reports December 1, 6 & 7, and 29, 2016



Aliso Canyon Turbine Replacement Project CPUC Site Inspection Form

Project:	Aliso Canyon Turbine Replacement	Date:	December 1, 2016
Project Proponent:	Southern California Gas Company and Southern California Edison	Report #:	VS125
Lead Agency:	California Public Utilities Commission	Monitor(s):	Vince Semonsen
CPUC PM:	Andrew Barnsdale, Energy Division	AM/PM Weather:	Clear and cold with gusting winds
E & E CM:	Lara Rachowicz	Start/End time:	0830 to 0900 at SCE components 0900 to 1130 at the Aliso Canyon Natural Gas Storage Field (Aliso Storage Field)
Project NTP(s):	The new Admin/IM Building (NTP-2), Central Compressor Station (CCS) (NTP-3), 12-kV power line (NTP-3), and PS-42 Fill Site. Tubular Steel Poles (TSPs) 2 through 42 (NTPs A, C, and D).		

SITE INSPECTION CHECKLIST

WEATP Training	Yes	No	N/A
Has WEATP training been completed by all new hires (construction and monitors)?	Х		
Erosion and Dust Control (Air and Water Quality)			
Have temporary erosion and sediment control measures been installed?	Χ		
Are erosion and sediment control measures properly installed and functioning?	Х		
Is mud tracked onto paved public roadways cleaned up in accordance with the project's SWPPP?	Χ		
Is dust control being implemented (i.e., access roads watered, haul trucks covered, streets cleaned on a regular basis)?	Х		
Are work areas being effectively watered prior to excavation or grading?	Χ		
Is excessive fugitive dust leaving the work area?		Х	
Equipment			
Are all vehicles observed maintaining a speed limit of 15 mph on unpaved roads?	Χ		
Are all vehicles/equipment observed arriving onsite clean of sediment or plant debris?	Χ		
Are vehicles/equipment turned off when not in use?	Χ		
Work Areas			
Is vegetation disturbance within work areas minimized?	Х		
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	Х		
Are vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	Х		
Are all excavations and trenches covered at the end of the day?	Х		
Are ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	Х		

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

AREAS MONITORED (i.e., structure numbers, yards, or substations)

SCE access roads to TSP 26 and TSPs 12-22. The PS-42 Fill Site, the new Admin/IM Building, 12-kilovolt (kV) pole work, and the CCS.

DESCRIPTION OF OBSERVED ACTIVITIES (i.e., mitigation measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews)

I drove by the SCE access roads at TSP-26 and at TSPs 12-22 (Photo 1) to check if best management practices (BMPs) had been added to the roadways. I did not observed any new BMPs at either location.

I arrived onsite at the Aliso Storage Field at 0900, stopping first at the P-37 staging area. The drilling rig had been removed, and most of the Kiewit materials had also been removed. Sediment control at the well pad drain inlet had been addressed with straw wattles added around the opening (Photo 2).

I stopped in at the Aliso Canyon Turbine Replacement (ACTR) Project office and spoke with Jennifer Campbell (SCG) and SCG's biological monitor Ray Romero (AECOM) about the ACTR Project activities and schedule. Based on our conversation, Kiewit is close to completing their work.

I drove to the Oak Tree Mitigation Site where a crew was conducting maintenance on the cages (Photo 3). The trees looked to be healthy and growing.

At the PS-42 Fill Site, I noted ponded water from the recent rain events (Photo 4). Ray Romero (AECOM) stated that 1.25 inches of rain accumulated during a storm about two weeks prior to my site visit, and an additional 0.25 inch was calculated during the recent rain event. A survey crew was working within the PS-42 Fill Site, and it looked like the crew was evaluating the best location for replacing the last of the plastic drainpipe going around the site.

A lift truck was parked near the 12-kV power line poles adjacent to the Natural Substation (Photo 5). Jennifer Campbell (SCG) and Ray Romero (AECOM) stated that additional work was needed for the newly installed mid-slope 12-kV pole. Another lift truck was parked on the A2 crane pad (Photo 11), but no work was being conducted at the time of my visit.

The burned straw wattles on the slope below the Natural Substation had been replaced (Photo 6).

At the CCS, the last segment of the blowdown pipe had been backfilled and the perimeter fence was installed over it (Photo 7). The crews were forming the drainage ditch connection over the blowdown line (Photo 8). Photo 9 shows the fence crew installing the perimeter fence at the CCS entrance. The drainage ditch along the main road going past the CCS needs to be cleaned out before the next rain event (Photo 10).

I walked to the A2 crane pad where I could see the new pole that had been installed up the hill between the A1 and A2 poles (Photo 12). BMPs had been installed. The access path had been staked and it looked like workers stayed on the designated route. I asked Ray Romero (AECOM) about BMPs for the access path, but he indicated that their consultant did not recommend any BMPs for those areas. A Quality AG crew was removing mud that had been tracked out onto the paved road. The small oak sapling planted near the crane pad had been impacted, again, by the recent work (Photo 13). The exclusion fence was significantly damaged and the oak tree, itself, sustained minor damage. I notified Jennifer Campbell (SCG) and Ray Romero (AECOM), and they stated that the issue would be addressed.

Photos 14 and 15 are overview shots of the CCS and new Admin/IM Building showing the extent of the construction activity.

MITIGATION MEASURES VERIFIED (Refer to MMCRP, e.g., MM BR-5. Report only on MMs pertinent to your observations today)

Onsite monitors were in place and overseeing the construction activities; all construction personnel appear to have gone through the training (APM HZ-6).

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)				
Follow-up on rainwater runoff coming down the Natural Substation access road. Possible energy dissipater/catch basin where the oak swale drainage meets the A2 access road.				
COMPLIANCE SUMMARY Below please describe any non-compliance issues or new biological/cultural discoveries (compliance level 0) that have occurred since your last visit. If you observe a non-compliance issue in the field, please note this on the monitoring datasheet, and for non-compliance Level 2 or 3 fill out and submit a separate Non-Compliance Report Form to E & E Compliance Manager. Inform E & E CM of any non-compliance incidents.				
Compliance Level 0: New biological or cultural discovery requiring compliance with mitigation measures, permit conditions, etc. If checked, please describe discovery and documentation/verification below.				
Non-Compliance Level 1: Violates the project's environmental requirements but does not immediately put environmental resources at risk. Applicant will need to correct the action and/or prevent repeat incidents of the same issue. If you checked this box, describe the incident below and follow-up to ensure correction.				
Non-Compliance Level 2: (Minor Incident) Level 2 should be those actions that have the potential to cause or cause immediate, minor risk to environmental resources such as activities that result in a deviation from the mitigation measure requirements that result in minor, short-term impact to resources. A non-compliance Level 2 situation may occur when Level 1 incidents are repeated, and show a trend toward placing resources at unnecessary risk. If you checked this box, please fill out a Non-Compliance Report.				
Non-Compliance Level 3: (Major Incident) Level 3 are those actions that have the potential to cause or cause immediate, major risk to environmental resources such as: major environmental incident that is not in compliance with the applicant mitigation measures, mitigation measures, permit condition, approval (e.g., variances, addendums) requirements, and/or environmental construction specifications; violation of the law; or documented repetitive occurrences of Level 2 Minor Incident events. If you checked this box, please fill out a Non-Compliance Report.				
Non-compliance issues reported by SoCalGas or SCE: Were there any new non-compliance issues reported by SoCalGas or SCE monitors since your last visit? If so, describe issues and resolution and include SoCalGas or SCE report identification number.				
Date Non-compliance issue and resolution Relevant NC Mitigation Measure NC				
PREVIOUS NON-COMPLIANCE ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:				

REPRESEN	ITATIVE SITE PHO	TOGRAPHS	
Date	Location	Photo	Description
12/01/16	TSP-22 Access Road		Photo 1 – No additional BMPs have been added to the access road.
12/01/16	P-37 Well Pad.		Photo 2 – New BMPs
			have been installed around the drain inlets.
12/01/16	Oak Tree Mitigation Site		Photo 3 – Crews were onsite conducting maintenance work on the oak tree cages.

REPRESEN	ITATIVE SITE PHO		
Date	Location	Photo	Description
12/01/16	PS-42 Fill Site		Photo 4 – Some water has ponded within the PS-42 Fill Site after the recent rains.
12/01/16	12-kV Poles near the Natural Substation		Photo 5 – Some work continues on the 12-kV poles.

REPRESEN	TATIVE SITE PHO	OTOGRAPHS	
Date	Location	Photo	Description
12/01/16	Natural Substation		Photo 6 – BMPs replaced on the south facing slope below the substation
12/01/16	CCS		Photo 7 – The blowdown line has been backfilled and the perimeter fence has been installed.
12/01/16	CCS		Photo 8 – Forms for connecting a drainage ditch over the blowdown line.

Date	ITATIVE SITE P Location	Photo	Description
12/01/16	CCS		Photo 9 – Fence installation at the CCS entrance.
12/01/16	CCS		Photo 10 – Drainage ditch along the main access road next to the CCS.

Date	ITATIVE SITE PHC Location	Photo	Description
12/01/16	12-kV A2 Pole		Photo 11 – Equipment on the A2 pole crane pad.
12/01/16	12-kV A2 Pole		Photo 12 – New pole installation between the A1 and A2 poles.

	ITATIVE SITE PHO		_
Date	Location	Photo	Description
12/01/16	12-kV A2 Pole		Photo 13 – Oak sapling slightly damaged by the ongoing work.
12/01/16	CCS		Photo 14 – Overview of the CCS from across Limekiln Creek.
12/01/16	New Admin/IM Building		Photo 15 – Overview of the new Admin/IM Building from across Limekiln Creek.



Aliso Canyon Turbine Replacement Project CPUC Site Inspection Form

Project:	Aliso Canyon Turbine Replacement	Date:	December 6 & 7, 2016
Project Proponent:	Southern California Gas Company and Southern California Edison	Report #:	EnE002
Lead Agency:	California Public Utilities Commission	Monitor(s):	Vince Semonsen, Andres Estrada, Jenny Vick
CPUC PM:	Andrew Barnsdale, Energy Division	AM/PM Weather:	Clear and cold with gusting winds.
E & E CM:	Lara Rachowicz	Start/End time:	12/6/16: 0930 to 1600 SCE components 12/7/16: 0830 to 1230 at the Aliso Canyon Natural Gas Storage Field (Aliso Storage Field)
Project NTP(s):	The new Admin/IM Building (NTP-2), Central Compressor Station (CCS) (NTP-3), 12-kV power line (NTP-3), and PS-42 Fill Site. Tubular Steel Poles (TSPs) 2 through 42 (NTPs A, C, and D).		

SITE INSPECTION CHECKLIST

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

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

AREAS MONITORED (i.e., structure numbers, yards, or substations)

SCE components TSP 21, TSP 24/25, TSPs 40, 41, and 42, TSP 7, TSP 30 and 32, TSP 12. The Natural Substation, PS-42 Fill Site, Oak Tree Mitigation Site, entrance to 12-kV/TSP-A2 access road, the new Admin/IM Building, and the CCS.

DESCRIPTION OF OBSERVED ACTIVITIES (i.e., mitigation measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews)

This report documents the two days of site visits conducted by Vince Semonsen (Ecotech Resources, Inc.) and Andres Estrada and Jenny Vick (both from Ecology and Environment, Inc. [E & E]), all representatives of the California Public Utilities Commission (CPUC).

On December 6, 2016, the CPUC compliance team met with SCE staff for a brief tailboard meeting at the Crescent Valley Mobile Estates (Mobile Estates) at approximately 0930. Chris May (SCE), Klaus Wojak (SCE), Todd White (Jericho), and Lucy Cortez (CASC) attended. We caravanned through the Mobile Estates to view TSP 21. The area had final best management practices (BMPs) in place, including jute netting on top soil areas and coconut coir netting on steep slopes (Photo 1). In October, the area around TSP 21, as well as numerous other areas, were cleared of invasive weeds. Native plants were growing on the previously disturbed slopes. Lucy Cortez informed the group that the pads had been compacted to +90% compaction and were very stable. Vince Semonsen was concerned about the stability of the access roads. Lucy Cortez informed the group that the roads were part of operations and maintenance (O&M) and were not included in the Aliso Canyon Turbine Replacement (ACTR) Project's Storm Water Pollution Prevention Plan (SWPPP) (Photo 2).

We visited Drainage #4, located between TSPs 24 and 25. Rills were present on the steep access road and likely formed during the recent rain events. Tree tobacco, an invasive species, was growing in several locations along the drainage (Photo 3). Todd White (Jericho) informed the group that the plants we observed were not present 6 weeks ago when SCE conducted invasive weed removal. SCE said that restoration of the area has been completed according to their water board permit, but they plan to conduct weed removal in January 2017. Vince Semonsen (CPUC) was concerned about a patch of soil between the access road and the culverts. The road has been graded so that water runoff will be directed away from this patch; however, Vince Semonsen was concerned that there was no netting or hydroseeding completed in this area; therefore, if water were to wash into this area, the soil could runoff into the drainage. Lucy Cortez (CASC) and Klaus Wojak (SCE) agreed that it is best to not disturb the area because some vegetation already has been growing (Photo 4).

We drove through the Aliso Canyon Storage Field (Aliso Storage Field) to access TSPs 40, 41, and 42. Derek Rodgers (SCG Environmental Coordinator) joined the group to view these components. We drove to TSP 40 and looked at the final BMPs. The jute netting had a good amount of vegetation regrowth (Photo 5). Vince Semonsen (CPUC) asked what the plan was for the area below TSP 40, because the area has become revegetated but was not part of the restoration plan. An erosion rill and degraded straw wattles were visible on this portion of the road (Photo 6). Lucy Cortez (CASC) informed the group that the area was listed as a road and is not part of the ACTR Project's SWPPP or revegetation plan. There was no plan to restore the area because O&M may use the area as a turn-around. We walked to the TSP 42 Well Pad to look at the permanent BMPs in place. This area has pin flags marking Mariposa lily areas (Photo 7).

The group went to view TSP 7; however, Lucy Cortez (CASC) was unable to attend the remainder of the site visit. The base of the access road had recently been paved, including the portion that runs past several homes. The area has permanent BMPs in place. Water bars and McCarthy drains had been installed to divert rainwater runoff from the access road. Some vegetation was removed due to fire concerns during construction. Vegetation was returning in those areas. Invasive weeds were recently removed from the area, but native plants were left in place.

We drove to TSP 30 and TSP 32 to view the final BMPs, including gabion baskets and McCarthy drains. BMPs were in place, and the site looked well stabilized (Photos 8 and 9). Chris May, Derek Rodgers, and Todd White, departed, and Klaus Wojak drove Vince Semonsen, Andres Estrada, and Jenny Vick to see the access road from TSPs 12 to 22. We stopped to look at the drainage near TSP 12. Tree tobacco was growing around the drainage.

On December 7, 2016, at 0830, we met at the ACTR Project trailer with SCG and SCE personnel. Derek Rodgers, Jennifer Campbell, Jim Strader, and Karen Kwan (all of SCG), Andrew McGann and Ryan Gray (Geosyntec), Chris May (SCE), and

SCE's biological monitor Todd White had a safety briefing from Sonia Rodriguez (SCG). The group rode in an SCG van to the Natural Substation. The Natural Substation was complete, and permanent BMPs were in place for both SCG and SCE. A water bar was installed on the access road to direct water into the biofiltration unit (Photo 10). There was a crew working on the 12-kilovolt (kV) line restringing the fiber optic cable and new conductor, as approved under MPR-10. SCG's SWPPP has been closed out for this area for about 3 months for the ACTR Project. We looked at the oak swale and the BMPs in place (Photo 11). There was no evidence of erosion from the past two rain events. The base of oak trees in the drainage were not showing signs of scour or damage (Photo 12). We also looked at the burned area from the fire incident that occurred during the previous month. New vegetation had begun to grow, and the slope looked to be stabilized. The facility has hired a contractor to investigate the fire and SCG had no update to provide. SCG informed us that the new All-Dielectric Self-Supporting (ADSS) cable, which was approved under MPR 10, may arrive as early as next week. [Update: this timing was clarified on the Monday 12/12/16 call; the ADSS cable delivery is anticipated in mid- to late January 2017.]

The group then drove to PS-42 Fill Site. No construction activity was taking place at this location. Minimal imports were expected for the duration of the ACTR Project. Once the ACTR Project is completed with imports, the PS-42 Fill Site will be turned over to O&M. SCG will stabilize the slopes before closing out the SWPPP and turning over to O&M. BMPs were in place along the access road and, overall, the permanent BMPs were in good condition. The plastic bypass drain was firmly in place on the PS-42 Fill Site slopes. Questions were asked regarding drainage under the PS-42 Well Pad; Photo 14 shows the inlet that connects to the PS-42 Fill Site bypass drain (Photo 13).

We visited the oak tree mitigation site. The slopes appeared to have been recently mowed. No watering was occurring during this time of year. The goal is to wean the trees off watering completely while monitoring is still occurring in order to ensure the survival of the trees. Initially, about 120 trees were planted. Approximately 100 trees remain. Most of the trees that were relocated to accommodate the new secondary relief well after the incident did not survive.

We parked near the TSP-A2 access road (Photo 15). We were unable to walk up and inspect the area because Henkels and McCoy were stringing the fiber optic cable after removing the lashing. We were able to look up the slope to see the new pole that was installed for the ADSS cable (Photo 16). The foot path the workers used to access the area was clearly marked, BMPs were in place, and sensitive resources were fenced off. SCG informed us that the drainage that runs from the oak swale to the TSP-A2 access road will be repaired by the Pipeline Integrity group. They have committed to fixing the area, and money has already been allocated. SCG was unsure of the timeframe; however, it will occur after Henkels and McCoy has completed their work in the area.

We walked to the upper sedimentation basin and observed newly installed straw wattles with black netting placed adjacent to the basin (Photo 17). A V-ditch needed maintenance, and degraded gravel bags were noted on slopes south of the CCS (Photo 18). We then walked around the new Admin/IM Building, noting a few BMP deficiencies (trench without escape ramps, uncovered stock pile, gaps around a covered excavation, and straw wattles that needed to be replaced) (Photos 19, 20, and 21). The biofiltration system was finished near the new Admin/IM Building, and plants were growing well. Crews were working inside the building. We walked around the CCS area and discussed the drainage system. All impervious surfaces have been directed toward the biofiltration systems (one at the new Admin/IM Building and one at the CCS). The surrounding mountains have historically drained under the new CCS area, and water runoff was still directed in that direction. SCG stated that, by diverting water from the impervious surfaces through biofiltration systems, there was actually less runoff directed through the historical drainage. Final landscaping of the CCS should provide solid stabilization of slopes below the CCS. The nitrogen leak testing truck was onsite with proper secondary containment (Photo 22). Fencing was being installed (Photo 23). The group then had a tour through the CCS.

MITIGATION MEASURES VERIFIED (Refer to MMCRP, e.g., MM BR-5. Report only on MMs pertinent to your observations today)

Onsite monitors were in place and overseeing the construction activities; all construction personnel appeared to have gone through the training (APM HZ-6).

RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)					
BMP deficiencies need attention at the CCS, including an escape ramp in the trench around new Admin/IM Building, the stock pile cover, and gaps around the excavation cover.					
Clean up the V-ditch abutting southern slopes at the CCS. Replace straw wattles that have black plastic netting with biodegradable straw wattles.					
COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on-site,					
environmental observations of note)					
COMPLIANCE SUMMARY Below please describe any non-compliance issues or new biological/cultural discoveries (compliance level 0) that have occurred					
since your last visit. If you observe a non-compliance issue in the field, please note this on the monitoring datasheet, and for non-compliance Level 2 or 3 fill out and submit a separate Non-Compliance Report Form to E & E Compliance Manager. Inform E & E CM of any non-compliance incidents.					
Compliance Level 0: New biological or cultural discovery requiring compliance with mitigation measures, permit conditions, etc. If checked, please describe discovery and documentation/verification below.					
Non-Compliance Level 1: Violates the project's environmental requirements but does not immediately put environmental resources at risk. Applicant will need to correct the action and/or prevent repeat incidents of the same issue. If you checked this box, describe the incident below and follow-up to ensure correction.					
Non-Compliance Level 2: (Minor Incident) Level 2 should be those actions that have the potential to cause or cause immediate, minor risk to environmental resources such as activities that result in a deviation from the mitigation measure requirements that result in minor, short-term impact to resources. A non-compliance Level 2 situation may occur when Level 1 incidents are repeated, and show a trend toward placing resources at unnecessary risk. If you checked this box, please fill out a Non-Compliance Report.					
Non-Compliance Level 3: (Major Incident) Level 3 are those actions that have the potential to cause or cause immediate, major risk to environmental resources such as: major environmental incident that is not in compliance with the applicant mitigation measures, mitigation measures, permit condition, approval (e.g., variances, addendums) requirements, and/or environmental construction specifications; violation of the law; or documented repetitive occurrences of Level 2 Minor Incident events. If you checked this box, please fill out a Non-Compliance Report.					
Non-compliance issues reported by SoCalGas or SCE: Were there any new non-compliance issues reported by SoCalGas or SCE monitors since your last visit? If so, describe issues and resolution and include SoCalGas or SCE report identification number.					
Date Non-compliance issue and resolution Relevant NC					
te Non-compliance issue and resolution Relevant NC Mitigation Report #					
PREVIOUS NON-COMPLIANCE ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:					

Date	Location	Photo	Description
12/6/2016	TSP 21		Photo 1 – Slopes adjacent to TSP 21 showing signs of native plant growth
12/6/2016	TSP 21		Photo 2 – Stabilized slopes and access road below TSP 21.
12/6/2016	Drainage 4 along TSP 24/25 Access Road		Photo 3 – Tree tobacco growing in/around the drainage.

REPRESEN [*]	TATIVE SITE PHO	TOGRAPHS	
Date	Location	Photo	Description
12/6/2016	Drainage 4 along TSP 24/25 Access Road		Photo 4 – Slope leading into the drainage above the culvert, with some vegetation growing.
12/6/2016	TSP 40 Access Road		Photo 5 – Stabilized slope with biodegradable BMPs in place.

REPRESEN [*]	TATIVE SITE PHO	TOGRAPHS	
Date	Location	Photo	Description
12/6/2016	TSP 40 Access Road		Photo 6 – Un-restored access road, degraded straw wattles, and slopes below TSP 41.
12/6/2016	TSP 42		Photo 7 – Flagged locations of Mariposa lily plantings and BMPs.
12/6/2016	TSP 30		Photo 8 – New culvert and armored drainage along access road.

REPRESEN	TATIVE SITE PH	OTOGRAPHS	
Date	Location	Photo	Description
12/6/2016	TSP 30		Photo 9 – Hilfiker wall, McCarthy drain, and gabion mattress installed at TSP 30.
12/7/2016	Natural Substation Access Road		Photo 10 – Water bar installed along the Natural Substation Access Road.

	TATIVE SITE PHO		Description
Date	Location	Photo	Description
12/7/2016	Oak Swale below Natural Substation		Photo 11 – Leaf litter and debris in reinforced oak swale.
12/7/2016	Oak Swale below Natural Substation		Photo 12 – Base of oak tree in reinforced oak swale, with no scour or damage evident.
12/7/2016	PS-42 Fill Site		Photo 13 – Drain bypass pipe with evidence of erosion upslope.

REPRESEN	TATIVE SITE PHO	DTOGRAPHS	
Date	Location	Photo	Description
12/7/2016	PS-42 Well Pad		Photo 14 – Underground vault with drain inlet that leads to the bypass pipe adjacent to PS-42 Fill Site (see photo above).
12/7/2016	TSP A2 Access Road		Photo 15 – BMPs placed near the V-ditch; orange fencing properly installed along the access road.
12/7/2016	12-kV Power Line		Photo 16 – Orange fencing installed around the new middle pole and cleared walking path.

Date	Location	Photo	Description
12/7/2016	Retention Pond South of the CCS		Photo 17 – Upper sedimentation basin/newt pond with older black plastic mesh wattles installed.
12/7/2016	Drain Outflow Below the CCS		Photo 18 – Degrading gravel bags, and dirt/gravel in the V-ditch.
12/7/2016	Slopes Between the New Admin/IM Building and the CCS		Photo 19 – Degrading straw wattle with black plastic netting along the walking path.

REPRESEN ⁻	TATIVE SITE PHO	TOGRAPHS	
Date	Location	Photo	Description
12/7/2016	New Admin/IM Building		Photo 20 – Inadequately covered stockpile.
12/7/2016	New Admin/IM Building		Photo 21 –Trenches around the new Admin/IM Building with no escape ramps.
12/7/2016	CCS		Photo 22 – Nitrogen leak testing with proper secondary containment.

REPRESE	NTATIVE SITE P	HOTOGRAPHS	
Date	Location	Photo	Description
12/7/16	CCS		Photo 23 – Crews installing a fence around the CCS, which requires digging and pouring concrete.



Aliso Canyon Turbine Replacement Project CPUC Site Inspection Form

Project:	Aliso Canyon Turbine Replacement	Date:	December 29, 2016
Project Proponent:	Southern California Gas Company and Southern California Edison	Report #:	VS126
Lead Agency:	California Public Utilities Commission	Monitor(s):	Vince Semonsen
CPUC PM:	Andrew Barnsdale, Energy Division	AM/PM Weather:	Clear and cold with gusting winds
E & E CM:	Lara Rachowicz	Start/End time:	0900 to 1130 at the Aliso Canyon Natural Gas Storage Field (Aliso Storage Field)
Project NTP(s):	The new Admin/IM Building (NTP-2 (NTP-3), and PS-42 Fill Site. Tubula		r Station (CCS) (NTP-3), 12 kV power line 2 through 42 (NTPs A, C, and D).

SITE INSPECTION CHECKLIST

WEATP Training	Yes	No	N/A
Has WEATP training been completed by all new hires (construction and monitors)?	Χ		
Erosion and Dust Control (Air and Water Quality)			
Have temporary erosion and sediment control measures been installed?	Χ		
Are erosion and sediment control measures properly installed and functioning?		Х	
Is mud tracked onto paved public roadways cleaned up in accordance with the project's SWPPP?	Χ		
Is dust control being implemented (i.e., access roads watered, haul trucks covered, streets cleaned on a regular basis)?	Х		
Are work areas being effectively watered prior to excavation or grading?	Χ		
Is excessive fugitive dust leaving the work area?		Х	
Equipment			
Are all vehicles observed maintaining a speed limit of 15 mph on unpaved roads?	Χ		
Are all vehicles/equipment observed arriving onsite clean of sediment or plant debris?	Χ		
Are vehicles/equipment turned off when not in use?	Χ		
Work Areas			
Is vegetation disturbance within work areas minimized?	Х		
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	Х		
Are vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	Х		
Are all excavations and trenches covered at the end of the day?	Х		
Are ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	Χ		

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

AREAS MONITORED (i.e., structure numbers, yards, or substations)

The PS-42 Fill Site, the new Admin/IM Building, 12-kilovolt (kV) pole work, and the CCS.

DESCRIPTION OF OBSERVED ACTIVITIES (i.e., mitigation measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews)

I arrived onsite at the Aliso Canyon Natural Gas Storage Field (Aliso Storage Field) at 0900 and stopped at the Aliso Canyon Turbine Replacement (ACTR) Project trailer where I spoke with SCG's biological monitor Ray Romero (AECOM). Ray Romero said the site had received approximately 2.5 inches of rain during the last storm, and some erosion issues were present on the 12-kV/A2 access road. Several crews were onsite conducting maintenance after the storm.

At the PS-42 Fill Site, the flat upper portion of the site was full of water, and a crew was onsite pumping the water from the site (Photo 1) into a large baker tank located up on the PS-42 Well Pad. Ray Romero did not know where the pumped water would be taken, but stated that it would be tested and taken offsite. The crew had already filled one tank in the morning and had hardly made a dent in the amount of water that was present. We speculated on where the water had come from, since most of the water coming down into the PS-42 Fill Site was redirected around the area. Soil that was to be compacted into the PS-42 Fill Site was stockpiled on the PS-42 Well Pad and covered with fiber blanket (Photo 2).

I walked up the A2 access road and noted the amount of rock, sediment, and leaves that had been deposited on the parking area just below the access road (Photo 3). The A2 access road was severely eroded with deep rills (>2 feet) all the way up the road and into the oak swale area. It appeared that a lot of water flowed down the oak swale (Photos 4 and 5). Crews were in the process of adding additional best management practices (BMPs) to the access road.

The A2 crane pad area was in good condition, with no visible impact from the storms (Photo 6).

Mud and debris appeared to have come off of the A2 access road, flowed across the parking area, crossed the Limekiln Creek bridge, and then created a large pond in the road below the CCS. The debris appeared to have clogged the drain inlet below the CCS and, subsequently, created the pond. The area had been cleaned up, but the mud deposited on the road showed the extent of the ponding (Photos 7 and 8). The area of ponded water appeared to have been so large and deep that water had run back into Limekiln Creek.

I walked up the paved roadway along Limekiln Creek and noted that the silt fencing installed to prevent newts from leaving the creek and traveling toward the CCS needed to be repaired (Photo 9).

At the new Admin/IM Building, BMPs had been upgraded at a number of locations below the buildings (Photo 10). Concrete work was ongoing around both buildings, with excavation, forming, and pouring taking place (Photos 11 & 12). A stockpile of soil had lost its cover, presumably due to the strong gusting winds (Photo 13).

The bioswale in the CCS was in good condition, with only a small amount of sediment noted at both of the inlets (Photo 14).

I drove back to the Natural Substation to look at the biofiltration unit and the oak swale to see how the area fared after the rain event. The height of the deposited mud indicated that the bioswale was full, but rainwater runoff did not appear to overtop the bioswale (Photo 15). The upper end of the oak swale looked stable, but a lot of water appeared to have come through the system and down through the oak drainage.

MITIGATION MEASURES VERIFIED (Refer to MMCRP, e.g., MM BR-5. Report only on MMs pertinent to your observations today)

Onsite monitors were in place and overseeing the construction activities; all construction personnel appear to have gone through the training (APM HZ-6).

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)	
Possible energy dissipater/catch basin where the oak swale drainage meets the A2 access road.	
COMPLIANCE SUMMARY Below please describe any non-compliance issues or new biological/cultural discoveries (compliance level 0) that have occusince your last visit. If you observe a non-compliance issue in the field, please note this on the monitoring datasheet, and for compliance Level 2 or 3 fill out and submit a separate Non-Compliance Report Form to E & E Compliance Manager. Inform CM of any non-compliance incidents.	non-
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Non-compliance issues reported by SoCalGas or SCE: Were there any new non-compliance issues reported by SoC or SCE monitors since your last visit? If so, describe issues and resolution and include SoCalGas or SCE report identification number.	alGas
Data Marana Fara Sana and malafar	
Date Non-compliance issue and resolution Relevant NC Mitigation Measure	t#
PREVIOUS NON-COMPLIANCE ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:	
FREVIOUS INDIN-COMPLIANCE HEMIS REQUIRING FULLOW-UP OR RESULVED TUDAT:	

Date	Location	Photo	Description
12/29/16	PS-42 Fill Site		Photo 1 – Water is being pumped out of the PS-42 Fill Site.
12/29/16	PS-42 Well Pad		Photo 2 – Covered soil stockpiles that are waiting to be placed in the PS-42 Fill Site.
12/29/16	Parking Area below the 12- kV/A2 Access Road		Photo 3 – Remaining mud and debris below the A2 access road.

Date	Location	Photo	Description
12/29/16	A2 Access Road		Photo 4 – Erosion rills or the A2 access road.
12/29/16	Oak Swale near the A2 Access Road		Photo 5 – Erosion at the base of the oak swale where it flows out onto the A2 access road.

	ITATIVE SITE PHO		I.B:
Date	Location	Photo	Description
12/29/16	A2 Crane Pad		Photo 6 – No erosion noted in and around the crane pad.
12/29/16	Deadwer		Photo 7 – Mud on the
	Roadway below the CCS		road shows the extent of the ponding.
12/29/16	Limekiln Creek Bridge		Photo 8 – Mud was deposited up to the edge of Limekiln Creek, indicating that water likely flowed into Limekili Creek at this location.

REPRESEN	NTATIVE SITE PHO	TOGRAPHS	
Date	Location	Photo	Description
12/29/16	Paved Road along Limekiln Creek and below the CCS		Photo 9 – Newt barrier (silt fencing) in need of repair or replacement along Limekiln Creek.
12/29/16	New Admin/IM Building		Photo 10 – BMPs have been upgraded below the new office buildings.

REPRESEN	ITATIVE SITE PHO	TOGRAPHS	
Date	Location	Photo	Description
12/29/16	New Admin/IM Building		Photo 11 – New concrete pads poured.
12/29/16	New Admin/IM Building		Photo 12 – Concrete work taking place.
12/29/16	New Admin/IM Building		Photo 13 – Soil stockpile uncovered by the strong winds.

12/29/16 CCS Photo 14 – Bioswall	Date	Location	Photo	Description
			PROTO	Photo 14 – Bioswale.

Date	Location	Photo	Description
12/29/16	Natural Substation		Photo 15 – Bioswale at the Natural Substation.