

# Mitigation Monitoring, Compliance, and Reporting Program

## COMPLIANCE PLAN

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### Valley-Ivyglen 115 KV Subtransmission Line Project

Version 3

May 2020



Prepared by Ecology and Environment, Inc. for:  
State of California  
Public Utilities Commission

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## Acronyms and Abbreviations

APLIC	Avian Power Line Interaction Committee
ARB	Architectural Review Board
BACT	best available control technology
BMP	best management practice
CAISO	California Independent System Operator
CalOSHA	California Occupational Safety and Health Administration
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CM	Compliance Manager
CPCN	Certificate of Public Convenience and Necessity
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
dba	A-weighted decibels
DOGGR	California Department of Conservation Division of Oil, Gas, and Geothermal Resources
DPR	California Department of Parks and Recreation
E & E	Ecology and Environment, Inc.
ECC	Environmental Compliance Coordinator
ECPM	Environmental Consultant Project Manager
EFL	Environmental Field Lead
EIR	Environmental Impact Report
Energy Division	California Public Utilities Energy Division
EPA	U.S. Environmental Protection Agency
EPM	Environmental Project Manager
ESHA	Environmentally Sensitive Habitat Areas
FAA	Federal Aviation Administration
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
FRED	Field Reporting Environmental Database
FTA	Federal Transit Authority
GCB	Gas circuit breaker
GHG	greenhouse gas
HABS	Historic American Building Survey
HCP	Habitat Conservation Plan
HMWMP	Hazardous Materials and Waste Management
hp	horsepower
HSC	Health and Safety Code
kV	kilovolt
L <sub>50</sub>	Sound level exceeded 30 minutes each hour
L <sub>max</sub>	Maximum sound level measured over one hour
MBTA	Migratory Bird Treaty Act
MSHCP	Multi-Species Habitat Conservation Plan
MM	mitigation measure
MMRP	Mitigation, Monitoring, and Reporting Plan

MMCRP	Mitigation Monitoring, Compliance, and Reporting Program
MVA	Megavolt ampere
NAHC	Native American Heritage Commission
NBMP	Nesting Bird Management Plan
NCCP	Natural Community Conservation Plan
NO <sub>x</sub>	oxides of nitrogen
NRHR	National Register of Historic Places
NTP	Notice to Proceed
NTSB	National Transportation Safety Board
PC	Project Commitments
PFM	Petition for Modification
PM	Project Manager
PM10	particulate matter less than or equal to 10 microns in diameter
POD	Plan of the Day
PRC	Public Resources Code
project	Valley-Ivyglen 115 KV Subtransmission Project
PTC	Permit to Construct
RCA	Regional Conservation Authority – Western Riverside County
RCRA	Resource Conservation and Recovery Act
ROW	Right-of-way
RTC	Regional Clean Air Incentive Market Trading Credits
RWQCB	Regional Water Quality Control Board
SCE	Southern California Edison
SCAQMD	South Coast Air Quality Management District
SOI	Secretary of Interior
SR	State Route
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
WEAP	Worker Environmental Awareness Plan
WRCMSHCP	Western Riverside County Multi-Species Habitat Conservation Plan

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## 1 Introduction

The California Public Utilities Commission (CPUC) granted a Permit to Construct (PTC) to Southern California Edison (SCE) for the Valley-Ivyglen 115-kV Subtransmission Project (project) on August 23, 2018 (Decision 18-08-026). As part of this action, the CPUC certified the Final Environmental Impact Report (FEIR) for the project and adopted the Mitigation Monitoring, and Reporting Plan (MMRP) presented in the FEIR. This document, referred to herein as the Compliance Plan, describes the Mitigation, Monitoring, Compliance, and Reporting Program (MMCRP), which serves as a working guide to maintaining environmental compliance for the project and includes revisions to mitigation measures that were addressed in the FEIR, as well as specific protocols, guidelines, and standard procedures for environmental compliance to be followed prior to and during project construction.

### 1.1 Project Overview

The proposed Valley-Ivyglen Project would include:

- Construction of a new, single-circuit 115-kV subtransmission line and fiber optic line. The route of the proposed Valley-Ivyglen Project would be approximately 27 miles long and constructed within approximately 23 miles of new ROW.
- Installation of overhead fiber optic lines on the proposed structures and underground in new (approximately 10,000 feet) and existing (approximately 13,200 feet) conduit.
- Transfer of existing distribution circuits along portions of the proposed subtransmission line to new 115-kV structures or to underground positions.
- Installation of new 115-kV switching and protective equipment at Valley and Ivyglen Substations.

The alignment of the proposed Valley-Ivyglen Project would generally follow the route approved in 2010 by CPUC Decision 10-08-009, with modifications to address erosion and landslide activity that occurred in the area. The modified route would traverse unincorporated Riverside County and the cities of Menifee, Perris, and Lake Elsinore.

In addition to route realignment, the proposed Valley-Ivyglen Project would include the following modifications compared to the 2010 approved project:

- Additional disturbance areas and access road changes;
- Alternate construction methods, including helicopter use, blasting, temporary transmission poles, and retaining walls;
- Additional underground installations;
- Additional transmission structures and types of transmission structures;
- Increased span lengths and depths of borings;
- Additional construction methods, including shoofly poles, blasting, guard structures, and helicopter use;

- Modifications to work areas, staging areas, and helicopter operation yards; and
- Modifications to the telecommunications system, including overhead and underground installation.

## **1.2 Mitigation Monitoring, Compliance, and Reporting Program**

### **1.2.1 Authority**

Pursuant to Public Resources Code section 21.002.1(b), one of the CPUC's functions as California Environmental Quality Act (CEQA) Lead Agency is to mitigate and/or avoid significant effects on the environment resulting from projects it approves. This includes ensuring the mitigation measures it adopts are effective, enforceable, and implementable. Under CEQA Guidelines Section 15097, the CPUC as Lead Agency is responsible for ensuring that implementation of the mitigation measures and SCE's project commitments (PCs) occurs in accordance with the MMCRP the CPUC adopted in its Final Decision on August 23, 2018. To fulfill its obligations, the CPUC is responsible for interpreting the mitigation measures and PCs to determine whether they are being implemented effectively.

The CPUC may conduct a comprehensive review to determine whether there are 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 3.1.5. If the CPUC determines that, based on the review, any conditions are not adequately mitigating significant environmental impacts caused by the project, the Energy Division may specify appropriate means and methods to ensure that the mitigation is being effectively implemented. These reviews will be conducted in a manner consistent with the CPUC's rules and practices.

The CPUC has additional authority under the Public Utilities Code. Consistent with the CPUC's rules and practices, including Public Utilities Code section 768, the CPUC may require the performance of any other act that the health or safety of its employees, passengers, customers, or the public may demand. Pursuant to Public Utilities Code sections 314 and 582, the CPUC may require documentation or copies of permits issued by other agencies.

### **1.2.2 Purpose**

The MMCRP includes provisions for monitoring and reporting. 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 PCs 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 PCs and mitigation measures. The CEQA Guidelines encourage lead and responsible agencies to cooperate in mitigation monitoring and reporting, where possible.

The MMCRP was prepared consistent with the framework in Chapter 9 of the FEIR, Public Resources Code (PRC) section 21081.6, and CEQA Guidelines section 15097. The MMCRP will be implemented until the final monitoring and reporting procedures identified in the following sections have been completed to the CPUC's satisfaction.

The purpose of the MMCRP is to:

- Ensure effective implementation of the PCs and mitigation measures adopted by the CPUC;
- Facilitate the monitoring, compliance, and reporting activities of the CPUC and its environmental monitoring team;
- Establish lines of communication related to mitigation monitoring; and
- Provide a method of effectively documenting and reporting compliance with SCE PCs and mitigation measures.

Therefore, this Compliance Plan:

- Lists mitigation measures and PCs and their monitoring and reporting requirements, as identified in the FEIR;
- Describes the process by which environmental monitors designated by CPUC Energy Division (Energy Division) staff will observe construction of the project to ensure implementation of each PC and mitigation measure; and
- Describes the process for recording “non-compliance” (i.e., evidence that SCE is not fully implementing each applicable PC and mitigation measure).

The Compliance Plan was developed to provide guidelines and standardize procedures for environmental compliance on the project. These procedures have been developed by the CPUC, in coordination with SCE and other responsible agencies, to help define reporting relationships, provide detailed information about the roles and responsibilities of the project’s environmental compliance team members, define compliance reporting procedures, and establish communication protocol. Throughout the course of project construction, the protocols, guidelines, procedures, communication lists, and schedules presented in the Compliance Plan may be revised as needed to address specific day-to-day realities of project construction.

### **1.2.3 Implementation**

Implementation of the MMCRP begins during pre-construction and continues until construction is complete and the CPUC concludes there is no further need for CPUC monitoring of the project or the CPUC determines implementation of the MMCRP is no longer necessary. SCE must perform post-construction monitoring for the project to comply with mitigation measure and PC requirements as described in the FEIR. Post-construction monitoring by SCE will continue until compliance with post-construction requirements (i.e., restoration) has been met.

### **1.2.4 Program Scope**

#### **1.2.4.1 CEQA Mitigation**

The project is subject to PCs and mitigation measures identified in the FEIR, which are collectively referred to as “CEQA mitigation.” To the extent CEQA mitigation expressly relies on, includes, or references permits or approvals from other federal, state, and local agencies, all terms and conditions of such permits or approvals are considered incorporated into the scope of the CEQA mitigation.

### 1.2.4.2 Other Permits and Authorizations

In addition to the CPUC, other federal, state, and local agencies have jurisdiction over resources in the project area. Potentially applicable permits for the project were addressed in the FEIR Project Description and are listed in Table 1-1. SCE must obtain permits and/or agency authorizations from various federal, state, and local agencies. Table 1-2 lists contact information for permitting agencies associated with the project. Note that this list may not include all permits needed during construction of the Project and all permits listed may not be needed from the agencies identified.

**Table 1-1 Permits, Consultations, and Approvals**

Permitting, Consultation, or Approval Requirement	Agency / Group	Purpose/Description
<b>Federal</b>		
Clean Water Act (CWA) Section 404 Nationwide Permit	U.S. Army Corps of Engineers	Section 404 regulates discharge of “fill” into “Waters of the United States”. Section 401 requires that any applicant for a Section 404 Permit also obtain a Clean Water Act Certification from the state (see below).
Federal Endangered Species Act Incidental Take Permit or Authorization under Natural Communities Conservation Plan (NCCP)	United States Fish and Wildlife Service	Special status species surveys and mitigation as required, take authorization (i.e., Incidental Take Permits, if required), and informal or formal consultation.
Federal Aviation Regulations Part 77 (Objects Affecting Navigable Airspace), Part 133 (Rotorcraft External-Load Operations)	Federal Aviation Administration	Consultation regarding objects that may affect navigable airspace. Consultation to determine whether Congested Area Plan approval for helicopter external-load operations is required.
<b>State</b>		
California Public Utilities Code Section 1001 et seq. and CPUC General Order No. 131-D	CPUC	CEQA review and overall approval of the proposed project, including approval of a CPCN or CPCN exemption and approval of a Permit to Construct.
Clean Water Act Section 401	Regional Water Resources Control Board – Region 8	Required for discharge into Waters of the U.S. or Waters of the State.
Section 402 of the Federal Clean Water Act, National Pollutant Discharge Elimination System General Permit for Discharge of Construction Related Storm Water	State Water Resources Control Board	Management of storm water during construction, Notice of Intent to prepare a Stormwater Pollution Prevention Plan (SWPPP) and compliance with the current Construction General Permit.
California Department of Fish and Game Code Section 1600 Lake and Streambed Alteration Agreement	California Department of Fish and Wildlife	Streambed Alteration Agreement when an activity will: divert or obstruct the natural flow of any river, stream, or lake, change the bed, channel, or bank of any river, stream, or lake, use material from any river, stream, or lake, or deposit or dispose of material into any river, stream, or lake.
California Endangered Species Act Section 2081 Incidental Take Permit or Authorization under NCCP	California Department of Fish and Wildlife	Take authorization (if required) and consultation with CDFW Consultation for Section 2081 of the California Endangered Species Act. Consultation is anticipated to be completed as part of the Participating Special Entity (PSE) application process to obtain “take” coverage under the WRCMSHCP.

**Table 1-1 Permits, Consultations, and Approvals**

<b>Permitting, Consultation, or Approval Requirement</b>	<b>Agency / Group</b>	<b>Purpose/Description</b>
California Streets and Highways Code 660 to 711.21, California Code of Regulations 1411.1 to 1411.6	California Department of Transportation	Caltrans requires that all work done within or spanning a state or interstate highway ROW receive an encroachment permit. Permits are also required for oversize and/or overweight truckloads that exceed legal load limits as defined by the California Vehicle Code.
National Historic Preservation Act Section 106, California Register of Historical Resources, California Public Records Act	State Historic Preservation Office	Consultation for Section 106 of the National Historic Preservation Act. Consultation regarding known cultural resources. Consultation regarding the listing of cultural or historic resources in the National Register of Historic Places or California Register of Historical Resources.
Native American Consultation	Native American Heritage Commission	Identifies the local recognized Native American groups.
<b>Local</b>		
Public water pipelines	Elsinore Valley Municipal Water District	Permit and consultation to relocate water pipeline at proposed substation site. The pipeline is owned and operated by EVMWD.
Air pollution and greenhouse gas emissions including fugitive dust.	South Coast Air Quality Management District	The stationary diesel generator at the proposed substation may require a SCAQMD permit. Rule 403 Permit for fugitive dust. Notification of demolition and asbestos removal (Rule 1403) for demolition of structures at horse ranch.
Threatened or endangered species (including the Stephen's kangaroo rat), and conservation plans.	Riverside County Habitat Conservation Agency	Consultation with RCHCA to determine "take" permit (Federal and State Endangered Species Acts) and mitigation requirements for proposed project areas in Riverside County that would cross habitat reserves and other areas covered by a Habitat Conservation Plan.
Protected trees, aqueduct crossings, and grading in unincorporated Riverside County.	Riverside County	Permits required for tree removal (e.g., mature trees and oak woodlands). The grading permit would incorporate requirements for spill protection.
All buildings constructed or demolished in unincorporated Riverside County	Riverside County Department of Building and Safety	Demolition permit required for removal of the existing horse ranch facilities on the proposed substation site including asbestos clearance permit. Permit required for design of the perimeter wall to ensure consistency with the surrounding community.
Installation of wastewater treatment systems, abandonment and abatement of septic systems, and destruction of water wells.	Riverside County Department of Environmental Health	Septic system installation permit required for the new septic system at the substation site. Closure permit required for the abandoned and abatement of existing septic systems. Permit required for destruction of onsite water well.
Encroachment on road crossings, and other public ROWs (including excavation along ROWs)	Riverside County Transportation Department	Encroachment Permit
Flood control, Post Construction BMP's	Riverside County Flood Control and Water Conservation District	Encroachment Permit, Water Quality Management Plan compliance
Encroachment on railroad Right-of-Way	Riverside County Transportation Commission	Encroachment Permit

**Table 1-1 Permits, Consultations, and Approvals**

Permitting, Consultation, or Approval Requirement	Agency / Group	Purpose/Description
Construction activities in public ROW or easements, tree protection, and grading within the city limits.	Cities of Lake Elsinore, Menifee, Perris, and Wildomar (ministerial)	Encroachment Permit, tree removal permits, and grading permits

Source: CPUC 2019

Key:

Caltrans = California Department of Transportation

CPUC = California Public Utilities Commission

CEQA = California Environmental Quality Act

EVMWD = Elsinore Valley Municipal Water District

NCCP = Natural Community Conservation Plan

RCHCA = Riverside County Habitat Conservation Agency

ROW = right-of-way

SWPPP = Storm Water Pollution Prevention Plan

**Table 1-2 Contact Information for Permitting Agencies Associated with the Valley-Ivyglen Subtransmission Line Project**

Agency	Address	Contact Person	Phone	Email Address
<b>Lead Agency</b>				
California Public Utilities Commission	Infrastructure Planning and CEQA 300 Capital Mall, 4 <sup>th</sup> Floor Sacramento, CA 95814	Patricia Kelly, Project Manager	(916) 210-1825	Patricia.Kelly@cpuc.ca.gov
<b>Federal Agencies</b>				
United States Army Corps of Engineers (USACE)	TBD – to be added if required. <sup>1</sup>			
United States Fish and Wildlife Service	Palm Springs Fish and Wildlife Office 777 East Tahquitz Canyon Way, Suite 208 Palm Springs CA 92262	Amanda Swaller Wildlife Biologist	(760) 322-2070 *404	Amanda.Swallor@fws.gov
Federal Aviation Administration	TBD	TBD	TBD	TBD

<sup>1</sup> USACE consultation and/or permitting is not currently anticipated for the Project.

**Table 1-2 Contact Information for Permitting Agencies Associated with the Valley-Ivyglen Subtransmission Line Project**

<b>Agency</b>	<b>Address</b>	<b>Contact Person</b>	<b>Phone</b>	<b>Email Address</b>
<b>State Agencies</b>				
California Department of Transportation (Caltrans)	464 W 4th Street 11 <sup>th</sup> Floor San Bernardino, CA 92401	Jose Fernandez	(559) 313-4326	Jose.jr.fernandez@dot.ca.gov
Regional Water Quality Control Board – Region 8 (Santa Ana)	3737 Main Street, Suite 500 Riverside, CA 92501	Marc Brown	(951) 321-4581	Marc.Brown@waterboards.ca.gov
Office of Historic Preservation	1725 23 <sup>rd</sup> Street, Suite 100 Sacramento, CA 95816	N/A	(916) 445-7000	Calshpo.ohp@park.ca.gov
Native American Heritage Commission	1550 Harbor Boulevard, Suite 100 West Sacramento, CA 95691	N/A	(916) 373-3710	nahc@nahc.ca.gov
<b>Local</b>				
Riverside County Habitat Conservation Agency	3390 University Ave, Suite 200 Riverside, CA 92501	Princess L. Hester – Director of Administration	(951) 405-6704	phester@wrcog.us
Elsinore Valley Municipal Water District	31315 Cheney Court, Lake Elsinore, CA 92530	Ronald Brees	951-675-3146	utilityrequest@evmwd.com
South Coast Air Quality Management District	21865 Copley Drive, Diamond Bar, CA 91765	TBD	TBD	
Western Riverside County Regional Conservation Agency	3403 Tenth Street, #320, Riverside, CA 92501	Tricia Campbell Director of Reserve Management and Monitoring	(951) 955-9700 (main) (951) 955-8805 (direct)	tcampbell@wrcra.org
Riverside County Transportation Commission	4080 Lemon Street, Riverside, CA 92501	Ruby Arellano Property Agent	951-987-7141	rarellano@rctc.org
Riverside County Department of Building and Safety	4080 Lemon Street, Riverside, CA 92501	Selvana Guirguis	951-955-1871	Sguirgui@rivco.org
Riverside County Department of Environmental Health	4065 County Circle Drive, Riverside, CA 92503	Michael Shalbuh	951-358-5055	mshalbuh@rivco.org

**Table 1-2 Contact Information for Permitting Agencies Associated with the Valley-Ivyglen Subtransmission Line Project**

Agency	Address	Contact Person	Phone	Email Address
Riverside County Transportation Department	2950 Washington Street, Riverside, CA 92504	Benjie Cho	951-955-6736	bcho@rivco.org
Riverside County Flood Control and Water Conservation District – Principal Permittee for Riverside County Municipal Separate Storm Sewer System (MS4)	1995 Market Street, Riverside, CA 92501	Rudy Tabares Jr.	951-955-0087	rstabare@rivco.org
City of Lake Elsinore	130 South Main Street, Lake Elsinore, CA 92530	Remon Habib	951-674-3124	rhabib@lake-elsinore.org
City of Menifee	29844 Haun Road, Menifee, CA 92586	Don Sharp	951-723-3726	dsharp@cityofmenifee.us
City of Perris	101 North D Street, Perris, CA 92570	Liset Hernandez	951-657-3280	LHernandez@cityofperris.org

### 1.3 Construction Schedule

Table 1-3 shows the construction activities, approximate number of workers for each activity, and an approximate schedule for the project.

**Table 1-3 Project Construction Activities and Estimated Schedule**

Project Component/Construction Activities	Duration in Weeks or Months <sup>a</sup>	Number of Workers during Peak Period <sup>b</sup>	Anticipated Start Date
VIG1-VIG3 Mobilization	2 weeks	10 <sup>c</sup>	07/11/2020
VIG1 Access roads, foundation installation, underground installation, structure installation, wire stringing	10 months	45 <sup>c</sup>	07/11/2020
VIG 2 Foundation installation, underground installation, structure installation, wire stringing	6.5 months	40 <sup>c</sup>	07/29/2020
VIG 3 Foundation installation, structure installation, wire stringing	9 months	50 <sup>c</sup>	09/02/2020
VIG1-VIG3 Restoration	11 months	10 <sup>c</sup>	05/05/2021
VIG4-VIG8 Mobilization	2 weeks	40 <sup>c</sup>	07/22/2020
VIG4 Access roads, foundation installation, structure installation, wire stringing	11 months	50 <sup>c</sup>	10/23/2020
VIG5 Access roads, foundation installation, structure installation, wire stringing	13 months	50 <sup>c</sup>	10/23/20

**Table 1-3 Project Construction Activities and Estimated Schedule**

<b>Project Component/Construction Activities</b>	<b>Duration in Weeks or Months<sup>a</sup></b>	<b>Number of Workers during Peak Period<sup>b</sup></b>	<b>Anticipated Start Date</b>
VIG6 Access roads, foundation installation, structure installation, wire stringing	9.5 months	50 <sup>c</sup>	11/05/2020
VIG7 Access roads, foundation installation, structure installation, wire stringing	7 months	50 <sup>c</sup>	09/12/2020
VIG8 Foundation installation, underground installation, structure installation, wire stringing	10 months	50 <sup>c</sup>	09/05/2020
VIG4-VIG8 Restoration	7 months	10 <sup>c</sup>	06/11/2021
<b>Totals</b>	<b>19 months<sup>e</sup></b>	<b>NTE 75 per day<sup>c</sup></b>	

Notes:

- <sup>a</sup> Construction durations are approximated and may not be continuous.
- <sup>b</sup> Number of workers does not include all management, environmental monitoring personnel, or inspectors.
- <sup>c</sup> Workers overlap with other project components and construction activities.
- <sup>d</sup> Workers at construction staging yards are accounted for under other listed construction activities.
- <sup>e</sup> Total duration of project construction.

## 2 Roles and Responsibilities

This section describes specific SCE and CPUC roles and responsibilities for the project. The CPUC is responsible for monitoring SCE’s compliance by verifying that SCE has adequately implemented mitigation measures and PCs and that construction activities are consistent with the Final EIR.

### 2.1 SCE Roles and Responsibilities

SCE personnel and contractors are responsible for implementing all mitigation measures, PCs, permit conditions, and the MMCRP. This includes all terms and conditions in permits or approvals from other federal, state, and local agencies. SCE must comply with project requirements, plan construction activities in a way that meets project requirements, document compliance activities and mitigation results, and implement the MMCRP.

#### 2.1.1 SCE Project Manager

**Role and Responsibility.** SCE’s Project Manager (PM), Mike Bass, is contracted to SCE’s Major Projects Organization and will provide the overall direction, management, leadership, and corporate coordination for the project. Mr. Bass 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 PCs, mitigation measures, and agency permitting requirements.

The SCE PM’s responsibilities include, but are not limited to:

- Leading coordination among engineering, construction management, and environmental staff for SCE;
- Leading the integration of environmental responsibilities into all levels of project construction activities; and
- Communicating project activities, schedules, and environmental and public relations issues to the project team as needed.

**Reporting Relationship.** The SCE PM reports to SCE's Major Projects Organization. The SCE PM gives direction to the SCE Environmental Project Manager (EPM), whose role is described below.

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

### **2.1.2 SCE Environmental Project Manager**

**Role and Responsibility.** SCE's EPM, Marcus Obregon, is responsible for providing the appropriate level of resources for successful environmental compliance throughout the duration of construction for the project. The SCE EPM communicates with staff at the resource agencies, the CPUC PM and Compliance Manager (CM) (that will be staffed by Ecology and Environment, Inc. (E & E)). The EPM 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 Plan (WEAP). The EPM is also responsible for ensuring compliance with requirements in project permits, PCs, and mitigation measures. The SCE EPM is ultimately responsible for ensuring that SCE construction crews maintain compliance with all project permits, PCs, and mitigation measures. The SCE EPM is the primary compliance point of contact for SCE.

The SCE EPM's responsibilities include, but are not limited to:

- Leading coordination between SCE staff and regulatory agencies to ensure that all agency requirements are met;
- Ensuring compliance with project PCs and mitigation measures, as well as any other project environmental policies, guidelines, and procedures;

**Reporting Relationship.** The SCE EPM reports to the SCE PM and advises the work of the project environmental compliance team and resource specialists.

**Communication.** The SCE EPM communicates with the resource agencies, the EM, and the SCE PM. The SCE EPM also oversees all communication with SCE contractors and team members.

### **2.1.3 Construction Contractor Environmental Manager (EM)**

**Role and Responsibility.** SCE's Construction Contractor Environmental Manager (EM), Hannah Collette, is responsible for providing support to the EPM for successful implementation and compliance under the MMCRP and all other applicable environmental permits.

The EM is responsible for overseeing compliance with the PCs, mitigation measures, and other project requirements. The EM will be responsible for managing contracts with subcontractors providing environmental services such as compliance monitoring. The EM will also act as a liaison between environmental and construction staff. The EM's responsibilities include:

- Directing the development and implementation of preconstruction environmental mitigation, planning, permitting, and compliance activities; environmental inspection program; preconstruction survey program; and WEAP;

- Ensuring compliance with mitigation and other environmental requirements during construction;
- Communicating environmental requirements to SCE Management Team, Construction Project Managers, Project Engineers, Superintendents, and Construction Foremen;
- Communicating with the CPUC Monitoring Team regarding environmental requirements, construction needs, and construction schedule changes;
- Providing oversight of environmental monitoring;
- Coordinating with construction management personnel;
- Monitoring and reporting post-construction restoration and compensation requirements;
- Resolving compliance issues;
- Reporting the effectiveness of mitigation and regularly submitting required documentation and notifications to SCE;
- Providing leadership to correct any issues with environmental compliance;
- Communicating with SCE and the CPUC Monitoring Team via weekly look ahead schedules, plan of the day schedules, and email updates as changes occur throughout the day and evening;
- Identifying project changes requiring Global Information System (GIS) updates to address new work areas

**Reporting Relationship.** The EM reports to the contractor’s Project Manager and supports the SCE EPM in directing the work of the project’s environmental compliance team and resource specialists.

**Communication.** The EM communicates with the contractor’s Project Manager, SCE EPM and project environmental compliance team.

#### **2.1.4 Construction Contractor Environmental Field Lead**

**Role and Responsibility.** The Construction Contractor Environmental Field Lead (EFL), Coltin Scott, is responsible for overseeing and verifying the day-to-day on-site compliance effort. The EFL will work closely with the EM and construction personnel and will be the primary field employee responsible for verifying and documenting environmental compliance. Multiple EFLs may be needed to effectively monitor compliance during periods of high construction activity or high monitoring demand. The EFL’s responsibilities will include:

- Supporting the EM in the completion of all necessary resource surveys; supporting the resource specialists in implementation strategy of the biological measures in the MMCRP and all plan and permit conditions relevant to resources during the preconstruction phase of the project;
- Providing Quality Control/Quality Assurance (QA/QC) of all deliverables;
- Coordinating with SCE regarding landowner access for surveys and construction activities;
- Participating in weekly or bi-monthly meetings; and

- Managing implementation of the WEAP in the field, including management of training logs.

**Reporting Relationship.** The EFL reports to the EM.

**Communication.** The EFL communicates with the SCE EPM, EM, and the project environmental compliance team, and the construction team to coordinate monitoring and implement project environmental compliance requirements. The EFL will also be the main point of contact in the field with the CPUC Compliance Monitors during construction.

### 2.1.5 Project Environmental Compliance Team

Project's environmental monitors, are the primary field staff responsible for evaluating, documenting, and verifying compliance of construction activities with all applicable requirements. The project environmental compliance team will be led by the EM under the direct supervision of the contractor Project Manager. The EM will coordinate the activities of the project environmental compliance team, including biological, paleontological, and archaeological monitors (i.e., specialty monitors), to comply with each PC and mitigation measure. The environmental compliance team will work closely with construction personnel to ensure that preconstruction surveys are completed and PCs and mitigation measures are effectively implemented. Specialty monitors will be assigned as needed and as required to protect sensitive biological, paleontological, archaeological, historic, and Native American resources.

In addition to ensuring compliance during construction, SCE is required to provide updates to the CPUC CM and PM. These updates will be provided by the daily Plan of the Day (POD). SCE will also submit a monthly Environmental Compliance Report that provides a summary of the past month's construction activities and any applicable environmental issues.

**Reporting Relationship.** The environmental compliance team reports to the EM.

**Communication.** The project environmental compliance team communicates with the EFL and EM regarding the status of monitoring and compliance in the field. The environmental compliance team will also interact with the CPUC Compliance Monitors during construction.

## 2.2 CPUC Roles and Responsibilities

### 2.2.1 CPUC Project Manager

The CPUC Project Manager (PM) has overall responsibility for determining the effectiveness of compliance with environmental requirements based on success criteria included for each PC and mitigation measure. The CPUC PM assigns monitoring and reporting responsibilities to a third-party contractor (E & E), as described below, and will oversee the work of the third-party contractor through review of monthly status reports. The CPUC PM 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 NTP will be submitted to the CPUC PM for review and approval. The CPUC PM will issue NTPs for construction of each phase of the project, as identified by SCE. The CPUC has the authority to halt any construction activity associated with adopted PCs and mitigation measures. A stop-work work would follow the communication procedure outlined in Section 3.4.3.

### **2.2.2 CPUC Environmental Monitoring Team**

The CPUC's third-party contractor, E & E, will report to the CPUC PM and will conduct monitoring and reporting activities on a regular basis for the duration of the project.

SCE holds the primary responsibility for ensuring compliance with the applicable mitigation measures and PCs. The CPUC environmental monitoring team ensures and documents compliance achievement. Compliance is documented through site inspection forms, mitigation measure and PC tracking, and weekly and monthly reports to the CPUC PM. The following comprise the CPUC Environmental Monitoring Team for the project:

- The CPUC (E & E) CM will oversee day-to-day monitoring activities for the Compliance Monitors and will be designated point of contact for in-field agency staff regarding compliance and minor project refinements. The CPUC CM will work with the CPUC PM and the CPUC (E & E) compliance monitoring team to determine the appropriate level of inspection frequency and will also oversee Compliance Monitors. The CPUC CM coordinates with CPUC Compliance Monitors to prepare monitoring reports for the CPUC. The CPUC CM will also have the most direct communication with the CPUC regarding monitoring and will serve as the point of contact for noncompliance events. The CPUC CM will stay apprised of construction activities, schedule changes, and construction progress.
- The CPUC (E & E) Deputy CM will support the CPUC CM and be available for compliance-related communications and coordination when the CPUC CM is unavailable.
- The CPUC (E & E) Compliance Monitors will record compliance issues, notify designated project members, report any problems to the CPUC CM and/or CPUC PM, and assist with other environmental monitoring activities (e.g., review of plans and reports submitted by SCE and tracking compliance activities). Compliance Monitors consist of staff from E & E and Ecotech Resources, Inc. The number of Compliance Monitors and frequency of site inspections will depend on the number of concurrent construction activities and their locations.

## **2.3 Organizational Chart**

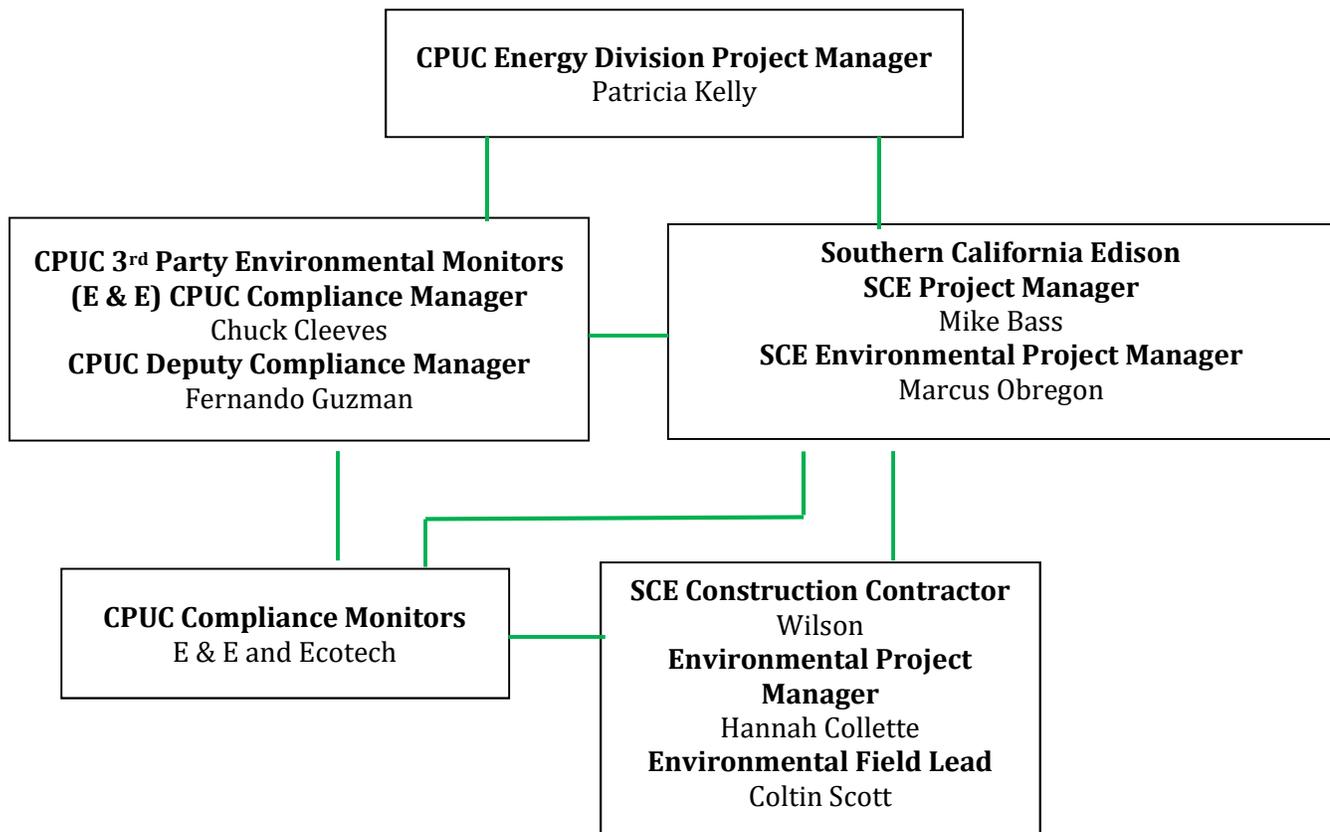
Figure 2-1 is an organization chart of CPUC and SCE personnel that illustrates communication between these personnel. The CPUC and SCE are responsible for informing others about changes in staff. Contact information is provided in Attachment A.

## **2.4 Permitting Agencies Role**

Personnel from permitting agencies identified in Section 1.2 may periodically visit the project site to verify compliance with or request information from SCE regarding compliance with laws, regulations, and project permits. SCE is responsible for responding to requests from permitting agencies and submitting the permits and authorizations to the CPUC according to project requirements. See Section 4 for document submission procedures.

Figure 2-1 Organizational Chart

Legend: **Solid Green Line** = Primary Communication Path<sup>2</sup>



<sup>2</sup> This chart depicts primary communication pathways only and **does not preclude** communication among various CPUC or project proponent field staff (e.g., Compliance Monitors, Environmental Consultants, and Construction Leads/Managers) and/or all Environmental Managers.

The CPUC will typically coordinate with SCE on permitting concerns prior to contacting permitting agencies related to the project; however, the CPUC may contact permitting agencies any time regarding the project and to clarify agency requirements, permit conditions, or approvals related to the agency's jurisdiction. The CPUC may also ask that SCE obtain input from the permitting agency or that SCE participate in discussion with the CPUC and the permitting agency. The CPUC will communicate the outcome of agency contact with SCE.

### **3 Procedures**

This section contains MMCRP procedures for the personnel identified in Section 2. These procedures are relevant during implementation of the MMCRP (see Section 1.2.3) to help ensure that the project meets all requirements specified in the PCs, mitigation measures, and agency permits.

#### **3.1 Communication Protocol**

Communication is a critical component of a successful environmental compliance program. To avoid project delays and possible workstoppages, environmental and construction representatives will need to interact regularly and maintain professional, responsive communications at all times. Similarly, representatives of SCE will need to coordinate closely with the Compliance Monitors to address and resolve issues in a timely manner. A communication protocol to accurately disseminate information regarding ongoing surveys and mitigation measures, construction activities, contractors, and planned or upcoming work to all levels of the project will be established 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.

##### **3.1.1 Preconstruction Coordination**

SCE is required by the terms of the mitigation measures, its PCs, and the permitting requirements of various other regulating agencies to prepare plans and obtain approval of these documents, in addition to performing various surveys and studies prior to construction. During the preconstruction coordination process, SCE may conduct meetings, conference calls, and site visits with technical representatives of the CPUC and other agencies, and SCE's environmental representatives, as appropriate. The purpose of the preconstruction coordination process is to discuss document submittal status, document the findings of data reviews and jurisdictional agency approvals, review SCE submittals, and document the status of mitigation measures and PCs as they apply to the project or phased project segment (see Section 4 for document submittal procedures). The goal of the preconstruction coordination process is to complete all required actions so the CPUC can issue NTP authorizations.

##### **3.1.2 Communication Protocol during Construction**

This section outlines daily, weekly, and monthly communication protocols and processes during construction.

###### **3.1.2.1 Field Staff Communication During Construction**

Regular communication among the CPUC compliance monitoring team, SCE, and construction staff can address many issues that arise during construction. 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 CPUC PM and CM as soon as possible, and the project contact list in Attachment A, updated accordingly.

The CPUC Compliance Monitors' primary point of contact in the field is the EFL. The CPUC Compliance Monitors will contact the EFL if an activity is observed that conflicts with one or more of the PCs, mitigation measures, or project plans. The CPUC Compliance Monitor will contact the EFL regarding construction crew work locations, construction schedule, and resources in the field. The SCE EPM can be contacted for the status of mitigation measures, PCs, and project plans. Much of this information can be obtained through participation in tailgate meetings prior to the start of construction each day. The CPUC Compliance Monitors may discuss construction procedures directly with the construction manager, 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 CPUC Compliance Monitors, especially those concerning construction means and methods, should be directed to the EFL. The CPUC Compliance Monitors will not provide work direction to the contractor or environmental monitors and will avoid directing questions to the construction crews.

#### **3.1.2.2 Progress Meetings and Communication During Construction**

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 CPUC PM, the SCE PM and EPM, the CPUC CM, the CPUC 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 changes, and any relevant compliance patterns and trends.

As discussed in Section 3.1.2, SCE will provide a Weekly Status Report to the CPUC PM and CM, which will include construction schedules for the upcoming week. The SCE EPM will provide status updates to the CPUC PM and CM.

In addition, SCE will prepare and distribute a monthly Environmental Compliance Report for distribution to key project members, including the CPUC PM and CM. The CPUC CM will review the reports to ensure that the status of PCs and mitigation measures are consistent with observations in the field. The report will also be a tool to keep all parties informed of construction progress and compliance trends. The monthly Environmental Compliance Report is described in Section 3.3.1.

#### **3.1.3 Questions and Clarifications**

Questions and the need to clarify project requirements will periodically arise throughout the implementation process. Both SCE and the CPUC shall submit important questions and

clarifications in writing via email (e.g., full compliance with mitigation measures, procedures, and project changes). Email correspondence and compliance and monitoring reports should be used to document resolutions.

#### **3.1.4 Construction Schedule**

SCE shall keep the CPUC team informed of delays in the construction schedule as contained in the MMCRP. In particular, SCE shall inform the CPUC, in a timely manner, of any schedule changes that may affect implementation of the MMCRP. Table 1-3 shows a general schedule for construction of the major components of the project.

#### **3.1.5 Dispute Resolution**

The Compliance Plan is intended to reduce or eliminate potential disputes between CPUC staff and SCE; however, even with the best preparation, differences in mitigation implementation approaches and interpretation may occur. Issues should first be addressed informally at the field level between the CPUC Environmental Monitoring Team and the project Environmental Compliance Team with questions that may be raised to the construction contractor EM, SCE EPM, PM, or Construction Manager, as necessary. Should the issue not be resolved at the field level, the following procedure will be observed for dispute resolution between CPUC staff and SCE:

- Disputes and complaints should be directed to the CPUC PM for resolution.
- Should this informal process fail, the CPUC PM may initiate enforcement or compliance action to address deviations from the approved project.

### **3.2 Preconstruction Compliance Verification of CEQA Mitigation**

The CPUC will verify compliance with preconstruction PCs and mitigation measures prior to construction. If required by the mitigation measure or PC, SCE must obtain approval of necessary resource-specific plans, verify that permitting requirements of other agencies have been met, and perform required surveys and studies before construction begins. The purpose of the preconstruction process is to complete required actions so that the CPUC can issue NTPs for the project.

#### **3.2.1 Preconstruction Plan Review and Permit Verification**

Table 3-1 outlines the plans, reports, and other documentation required for compliance verification.

The CPUC CM and technical experts will review plans and reports submitted by SCE and will provide comments and request revisions, if necessary. Other agencies may also review plans and reports prior to or concurrent with the CPUC, if required by mitigation measures, PCs, or permits, and provide comments. SCE will provide the CPUC with the other agencies' comments on these documents to ensure that the plans and reports adequately achieve the goals, performance standards, and any other requirements of the mitigation measure(s) or PC(s). The CPUC will only issue an NTP for the project if it is satisfied that resource-specific plans and reports comply with the goals, performance standards, and any other requirements of the applicable mitigation measure(s) or PC(s).

**Table 3-1 Valley - Ivyglen: Plans, Reports, and Other Documentation Required for Compliance Verification**

Item	MM or PC	Responsible Action Agency
Worker Environmental Awareness Program	PC HAZ-1	CPUC
Lake Street Landscape Plan	MM AES - 4	CPUC
Dust Control Plan	MM AQ - 3	CPUC
Habitat Restoration and Revegetation Plan	MM BR-7	CPUC
Invasive Plant Management	MM BR-9	CDFW
Nesting Bird Management Plan	MM BR-11	CDFW, USFWS
SWPPP #1 (yards)	MM BR-15	Santa Ana Regional Water Quality Control Board
SWPPP #2 (project)	MM BR-15	Santa Ana Regional Water Quality Control Board
Cultural Resources Monitoring and Treatment Plan	MM CR-1b	CPUC
Paleontological Resource Monitoring Plan	MM CR-4	CPUC
Contaminated Soil/Groundwater Contingency Plan	MM HZ-2	CPUC
Fire Control and Emergency Response Plan	MM HZ-4	CPUC
Noise Control Plan	MM NV-1	CPUC
Blasting Mitigation and Monitoring Plan	MM NV-2	CPUC
Blasting Plan	MM WQ-1	CPUC
Traffic Management and Control Plan	MM TT-1	Caltrans
Highway Closure Plan	MM TT-3	Caltrans
Helicopter Lift Plan	MM TT-4	CPUC

Key:

PC = Project Commitment

CDFW = California Department of Fish and Wildlife

CPUC = California Public Utilities Commission

MM = Mitigation Measure

USFWS = United States Fish and Wildlife Service

The CPUC may authorize construction on a phased basis, and E & E will coordinate preconstruction compliance review accordingly. In the event that construction authorization is issued in phases, NTPs will be issued for each phase as soon as preconstruction compliance is satisfactorily accomplished for that phase.

### 3.2.2 Notice to Proceed Process

SCE is required to obtain CPUC authorization prior to initiating construction activities through the NTP process. The NTP process involves SCE submitting an NTP request to the CPUC, and the CPUC PM issuing an NTP authorization letter. 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 an NTP, the Energy Division will confirm that SCE has complied with all preconstruction PCs and mitigation measures, including specified surveys, and has obtained all appropriate approvals from other regulatory agencies. The CPUC PM may authorize project activities through one or more NTPs for separate phases of the project as determined necessary. SCE may determine the phases based on preconstruction compliance, 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. Note that the CPUC may not include new

conditions or requirements that are inconsistent with the Final EIR; however, CPUC may include new conditions or requirements that are consistent with the Final EIR. Construction is defined as all construction-related activities, including site clearing; placement of signs, fences, structures, or other materials; or any mobilization activity that would move construction-related equipment and/or materials onto a site.

An NTP request must include the following, as applicable:

- 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 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;
- Brief description of the location of the project component or components covered in the NTP request, including maps, photographs, or other supporting data;
- Estimate of area of total land disturbance and use, both temporary and permanent, associated with the NTP request;
- Date of expected construction initiation and duration of work;
- Anticipated number of construction workers, including total workers and peak number;
- Anticipated equipment over 50 horsepower (e.g., loaders, forklifts, trucks, compressor trailers) required for construction;
- Verification that all relevant preconstruction PCs and mitigation measures have been or will be completed or implemented (e.g., submittal of biological resource survey reports);
- List of all relevant PCs and mitigation measures that will be implemented;
- Verification that all applicable permits or agency approvals have been or will be obtained for the work covered by the NTP request (if required); and
- For any preconstruction compliance items that cannot be completed prior to issuance of the NTP due to specific timing requirements for the item (e.g., preconstruction surveys that must be completed within a defined timeframe), a description of the outstanding submittals and timing for when they will be completed and approved prior to construction.

In conjunction with the CPUC CM, the CPUC environmental monitoring team will review each NTP request in accordance with the steps outlined below:

1. SCE submits an NTP request;
2. The CPUC PM or CM distributes the NTP request to the appropriate resource specialists and reviewers to determine the completeness of the request, as applicable;
3. The CPUC PM and/or CM also review the NTP and, if needed, prepare a list of outstanding requirements, identifying where additional information or clarification is needed;
4. The CPUC PM or CM submits any questions and comments, including requests for required additional information or clarification, to SCE via email;

5. As needed, SCE submits clarifications and/or additional information to be added to the NTP request in a memo, email, or letter, along with responses addressing all comments and questions forwarded by the CPUC PM and/or CM;
6. The CPUC PM and/or CM update the Project Implementation Tracker 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 are also considered for incorporation into the NTP approval letter and compliance table;
7. The CPUC CM prepares the draft NTP authorization letter, which documents the scope of work, compliance with all requirements, and outstanding conditions; and
8. The CPUC PM reviews and approves the NTP authorization letter and sends the approval to SCE.

### 3.3 Monitoring and Compliance Reporting during Construction

As the Lead Agency under CEQA, the CPUC is required to monitor the project to ensure that the PCs and mitigation measures are implemented. The Energy Division has primary responsibility for ensuring full compliance with the provisions of the monitoring program. The CPUC Compliance Monitors, under the supervision of the CPUC 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.

#### 3.3.1 SCE Monitoring and Compliance Reports

The EFL will be on site on a daily basis to coordinate specialty environmental monitors (such as biologists and archeologists), assist construction crews with interpreting PCs and mitigation measures, and help correct compliance problems in a timely manner. Several PCs and mitigation measures require SCE to supply a specialty monitor with specific qualifications. These monitors and the related PCs and mitigation measures are identified in Table 3-2.

**Table 3-2 SCE Specialty Monitors Required during Construction**

Specialty Monitor	Related PC or MM
CPUC-approved biologist	MM BR-2, MM BR-3, MM BR-8, MM BR-11, MM BR-12
CPUC-approved avian biologist	MM BR-11, MM BR-12
Archaeologist	MM CR-1a, MM CR-1b
Native American monitor	MM CR-1a, MM CR-1b, MM CR-2
Paleontologist	MM CR-4, MM CR-5
Historic architect monitor	MM CR-1b

SCE will submit a POD showing the anticipated construction activities for the following week. The POD, or Plan of the Day, will include the type of work activity (e.g., vegetation clearing, grading, foundation installation, and structure erection), the location of the work activity, and the day or days that work is anticipated to take place. SCE’s construction contractor (Wilson) will be distributing the POD to all necessary personnel daily and will show activities for the subsequent three days.

The CPUC Compliance team will communicate with the EFL to confirm daily work locations and schedule as needed in order to convey unanticipated minor schedule changes.

SCE will prepare and submit a Monthly Environmental Compliance Report to the CPUC by the 10<sup>th</sup> for the previous month's work activities. The Monthly Environmental Compliance Report will include the following:

- Construction status update for all active work phases and a look-ahead work description and schedule for subsequent work.
- 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 project changes, 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 or as self-reported.

As discussed in Sections 3.4.4 and 3.4.5, SCE will also submit Weekly Public Complaint Logs and Non-Compliance Incident Reports as detailed below.

### **3.3.2 CPUC Monitoring and Compliance Reports**

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

The CPUC CM will use the site inspection forms 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 CPUC PM.

## **3.4 Non-Compliance Incidents and Stop Work Orders**

The CPUC determines if any construction activity deviating from permit conditions, NTPs, PCs, or mitigation measures, particularly when the activity puts a sensitive resource at risk, should be considered a non-compliance incident. A non-compliance incident may include failure to fully comply with all terms and conditions in permits or approvals from other federal, state, and local agencies that are relied upon in the mitigation measures and PCs. In addition, a PC or mitigation measure not implemented according to the timing listed in the MMCRP table (Table 5-2 in this document) would be considered a non-compliance incident. Examples of non-compliance incident levels are provided under the subheadings below.

### 3.4.1 Non-Compliance Incident Level

The CPUC uses the following levels to categorize 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 impact, or have the potential to impact, environmental resources. Examples include the one-time use of an unapproved, pre-existing access road or failure to properly maintain an erosion or sediment control structure, but the structure remains functional. Repeated minor compliance incidents (three incidents) resulting from the same action or individual may result in elevating the non-compliance level.

**Non-compliance Level 1:** A Level 1 non-compliance incident is an action that deviates from project requirements or results in the partial implementation of the mitigation measures but does not impact, or have the potential to impact, environmental resources. An example includes work or staging of materials outside of approved work limits where the incident is within a previously disturbed area, such as a gravel lot.

**Non-compliance Level 2:** A Level 2 non-compliance incident is an action that deviates from project requirements or mitigation measures that results in minor impacts, or has the potential to result in minor impacts, to environmental resources. Examples include construction activities occurring within an exclusion zone with indirect impacts to sensitive species or significant cultural or paleontological 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:** A Level 3 non-compliance incident is an action that deviates from project requirements and results in major impacts or has the potential to immediately result in major impacts, to environmental resources. These actions are not in compliance with the PCs, mitigation measures, permit conditions, and/or approval requirements (e.g. minor project changes, NTPs), and/or violate local, state, or federal law. Examples include irreparable damage to archaeological sites, destruction of protected active bird nests, and grading of unapproved vegetated areas. A Level 3 non-compliance notice may also be issued if Level 2 incidents are repeated. Level 3 non-compliance incidents may result in a full or partial project shutdown following a stop-work order from the CPUC PM.

### 3.4.2 CPUC Compliance Team Incident Response and Communication

The incident response process is depicted in Figure 3-1.

**Figure 3-1 CPUC Non-Compliance Incident Response**

CPUC Non-Compliance Incident Response Figure 3.2.ai-4/30/20



<sup>1</sup> Project mitigation measures, PCs, plans, permit conditions, and NCCP/HCP protocols.

The incident response communication process is described in detail below.

- A non-compliance incident may be discovered by the CPUC compliance monitoring team (offsite) or observed by the CPUC Compliance Monitor (on site) 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 CPUC CM will contact the CPUC PM and SCE EPM immediately, as described further below. If the non-compliance incident does not require immediate resolution, the incident will be discussed in a phone call or email to the SCE EPM 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, 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 CPUC Compliance Monitor will notify the CPUC CM, who may authorize a temporary hold. The temporary hold will be conveyed verbally by the CPUC Compliance Monitor to the SCE EPM to halt construction in a safe manner (Section 3.4.3).
  - Once the issue is resolved, and after the CPUC Compliance Monitor consults with the CPUC PM or CM, the Compliance Monitor will verbally authorize the lift of the hold to SCE's EPM. If the issue is not fully resolved and may require further action or management discussions, the CPUC CM will recommend that the CPUC PM issue a stop-work order or initiate a stand-down.
  - If on site SCE environmental monitors/EPMs are unaware of the issue or are aware of an issue but do not act within a reasonable time period to resolve it, the CPUC compliance monitoring team may record the non-compliance in their reports. Level 1 incidents are generally "issued" in the site inspection form but may also be identified by Compliance Monitors during review of monitoring reports. Level 2 or 3 incidents require consultation with the CPUC CM and are issued in separate formal reports to SCE.
- SCE should contact the CPUC CM immediately for serious non-compliance incidents and report minor non-compliance incidents via e-mail and possibly a phone call. The CPUC CM will send an email notification to the SCE EPM to ensure tracking of the incident. The CPUC will typically not issue a non-compliance notice for a minor or level 1 self-reported incident. Non-compliance incident reporting is described in additional detail in Section 3.4.4.
- Following the initial discovery or report, the CPUC 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 CPUC CM will direct SCE to submit the information via email or through a formal non-compliance report, according to the incident severity. The CPUC 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 CPUC PM. For serious non-compliance incidents, the CPUC PM may issue a stop-work order as described in Section 3.4.3. Work will be suspended within the affected area until a resolution can be planned and the CPUC PM authorizes the resumption of construction activities in writing.

- A stand-down may be initiated by the CPUC PM, CPUC CM, or SCE, as described in Section 3.4.3. In this case, 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 CPUC 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 (8am to 5pm) will be addressed by staff identified as emergency contacts on the Project Contact List (Attachment A).
- Permitting agencies may require notification if there is an incident that relates to an agency's jurisdiction over the project. SCE shall be responsible for notifications to permitting agencies and shall provide copies of official notifications and submittals sent to other agencies to the CPUC. If the CPUC finds that a notification to another agency is required, the CPUC may direct SCE to notify the other agency.

### **3.4.3 Construction Halts and Stop Work Orders**

Several scenarios may occur during project construction for which the CPUC environmental team may need to communicate immediately with field staff to halt construction activity (when it is safe to do so), including the following

- A temporary hold is a short-term (i.e., less than 8 hours) cessation of construction activities that could be called by CPUC Compliance Monitors. This hold would be implemented in circumstances where a minor clarification of a mitigation measure or resolution of a minor issue by the field compliance crews is necessary to ensure environmental compliance where a resource is at risk, or where a serious environmental infraction could occur without immediate intervention. CPUC Compliance Monitors would consult with the CPUC PM or CM in the case of a temporary hold and are authorized to end the hold with clear communication to the SCE EPM, and EM, 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 of a serious non-compliance or safety issue (e.g., take of a listed species; repeated, high-level non-compliance incidents concerning the same resource; or serious worker injury), the CPUC may elect to issue a stop-work order. The stop-work order would be issued in writing by the CPUC PM and may require work to stop on all or portions of the project, or on certain construction activities, for a time period determined by the CPUC 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 CPUC compliance team. Resolution of the compliance issue would be communicated in writing by SCE to the CPUC PM, who would then issue an end to the stop-work order in writing. SCE 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, SCE should address any serious safety issues by calling 911 immediately.

- Either the CPUC 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 CPUC 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 CPUC 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 stated. Resolutions resulting from a stand-down should be submitted in writing to the CPUC PM. A stand-down initiated by SCE does not require approval by the CPUC to re-start work.

#### **3.4.4 Non-Compliance Reporting**

If SCE discovers a non-compliance incident of any magnitude, they must notify the CPUC CM of the incident (self-report). Subject to a subsequent CPUC determination, SCE shall assign the self-reported incident a non-compliance level and will track all compliance incidents and observations in the Field Reporting Environmental Database (FRED). Non-compliance incidents may also be discovered by the CPUC compliance monitoring team and brought to the attention of SCE. For both self-reports and discoveries, the CPUC CM may request an e-mail or a formal non-compliance incident report (Attachment C) from SCE, 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 CPUC CM and/or PM will determine next steps for reporting and follow-up to reestablish compliance. As needed, the CPUC CM or PM will assign or re-assign the incident a non-compliance level and issue a non-compliance report to SCE. SCE must track all non-compliance incidents and document the incidents and implementation of corrective actions in their monthly reports (see Section 3.3.1 for reporting procedures).

#### **3.4.5 Public Complaints**

The public may complain about various aspects of the project. SCE shall document and report all complaints to CPUC.

SCE shall provide weekly summaries of public complaints, including how each complaint was addressed within the Weekly Status Report. The CPUC CM and/or PM will coordinate with SCE's PM or EPM who will work with SCE's Local Public Affairs Manager to determine the adequacy of corrective actions or additional measures to be implemented, as necessary.

Public complaints will not reflect negatively on SCE's environmental compliance record unless a specific project requirement, permit, or plan requirement was violated.

#### **3.4.6 CEQA Citation Program**

Resolution E-4550 (May 9, 2013)<sup>3</sup> created the CEQA Citation Program that authorizes CPUC staff to fine public utilities for non-compliance. The program allows CPUC staff to draft and issue citations and levy fines for non-compliance with a PTC. CPUC staff will determine whether a fine is

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<sup>3</sup> <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M065/K136/65136746.PDF>

appropriate for non-compliance events consistent with Resolution E-4550. Examples of non-compliance 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 an NTP (see Section 3.2.2);
- 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 a biological monitor on site;
- Use of new access roads, overland travel routes, staging areas, or extra workspaces 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.

### **3.5 Minor Project Refinements**

This section describes the CPUC's process for CPUC staff approval of minor project refinements that SCE may request due to minor changes identified through final engineering or during construction that require minor changes to the project as approved. Minor project refinements would be strictly limited to changes that do not trigger additional permit requirements (other than local government ministerial permits), do not increase the severity of an impact or create a new significant impact, and are within the geographic scope of the Final EIR. The CPUC, along with the CPUC CM, would evaluate any proposed changes from the approved project to determine whether they are consistent with approved CEQA requirements. If the CPUC determined the changes to be consistent with approved CEQA requirements, a requested change would be processed as a minor project refinement using the Minor Project Refinement Form (Attachment D). If a project change would create or have the potential to create a new significant impact, increase the severity of an impact, or occur outside the geographic area evaluated in the Final EIR, SCE would be required to submit a Petition for Modification (PFM). The CPUC would evaluate the PFM under CEQA, as appropriate, to determine what form of supplemental environmental review would be required.

Requests for CPUC PM/CM approval of a minor project refinement must be made in writing and include the following:

- A detailed description of each proposed change, including an explanation of why the change is necessary;
- Identification of the PCs, mitigation measures, project parameters, or other project stipulation for which the proposed change is being requested, and citations for any associated 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 change;
- The potential impacts of the proposed change, including a discussion of each environmental issue area that could be affected by the changes, with accompanying verification that there would be no increase in the severity of identified significant impacts on resources affected by the project and no new significant impacts, after application of previously adopted PC(s) and/or mitigation measure(s);
- Whether the proposed change would conflict with any PCs or mitigation measures;
- Whether the proposed change would conflict with any applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy;
- Identification of any local government ministerial permits required to be obtained and a statement to the effect that no other permits are required for the proposed change; and
- The dates during which construction is anticipated to occur at the proposed change site area.

The CPUC PM or CM may request additional information, agency consultations, or a site visit in order to process the request.

Examples of minor project refinements that may be approved by the CPUC PM through submittal of a Minor Project Refinement Form include, but are not limited to, the following:

- 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 that 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.

### **3.6 Compliance Tracking**

The CPUC will track compliance with mitigation requirements. The CPUC will also track important project procedures (e.g., formal request and approvals) and incidents throughout the project. The CPUC will track other information as part of the CPUC-authored Monthly Monitoring Summary Report, including NTP and minor project refinement requests and approvals, resolutions to compliance risks, and documented incidents.

## **4 Documentation and Submittal Requirements and Records Management**

### **Electronic Submittals**

All required documentation from SCE, including plans, permits, reports, and staff qualifications as required by PCs and mitigation measures, will be maintained by SCE in FRED with access to these documents provided to CPUC and E & E. In addition, SCE shall provide the CPUC with electronic records (i.e., emails, permits, and authorizations) related to final agency approvals for the project if the CPUC is not directly involved with the coordination effort. Pursuant to Public Utilities Code section 314, SCE must also provide the CPUC with copies of permit amendments and modifications in addition to notifying the CPUC of proposed permit changes. The electronic records may be submitted by email or transmitted via FRED.

### **Onsite Documentation**

In addition, copies (digital or hard copy) of the MMCRP and applicable plans and permits compiled prior to and during construction (e.g., Traffic Management and Control Plan, Noise Control Plan, etc.) shall be kept onsite (SCE construction trailer), and supervisory staff working on the project should be familiar with their contents.

### **Administrative Record**

The CPUC CM 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 PCs and mitigation measures. The CPUC CM will also use this documentation to create a final environmental compliance report or presentation for the CPUC PM that will discuss PC and mitigation measure implementation and success, with the goal of identifying lessons learned that can be applied to future projects.

### **Public Access**

Through the CPUC's public website for the project, members of the public may request copies of non-confidential records and reports used to track the monitoring program, and the CPUC PM or CM will send copies of publicly available records and reports to members of the public as requested. Certain mitigation monitoring related documents will be made available on the project website: <http://www.cpuc.ca.gov/Environment/info/ene/ivyglen/ivyglen.html>.

## 5 Mitigation Monitoring Program Table

Table 5-1 summarizes project impacts that the Final EIR determined to be significant or less than significant with mitigation incorporated and identifies associated PCs and mitigation measures required to reduce the impact. Table 5-2 presents the full list of PCs and mitigation measures and incorporates all changes to the project, PCs, and mitigation measures, including those that were made as a result of public review of the Draft EIR (dated February 2015) and the Final EIR Errata (published April 2016).

A copy of the PCs and mitigation measures should be kept with each crew working on the project, and all supervisory staff working on the project should be familiar with its contents.

**Table 5-1 Project Impacts with Applicable PCs and Mitigation Measures**

Impact	Project Commitment (PC) or Mitigation Measure (MM)
<b>Aesthetics</b>	
<b>Impact AES-2:</b> Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway.	<b>Project Commitment D: Habitat Restoration and Revegetation Plan;</b> <b>MM AES-1: Staging Area Screening;</b> <b>MM AES-2: Segment VIG2 Wood Pole and Undergrounding.</b>
<b>Impact AES-3:</b> Substantially degrade the existing visual character or quality of the site and its surroundings	<b>Project Commitment D: Habitat Restoration and Revegetation Plan;</b> <b>MM AES-1: Staging Area Screening;</b> <b>MM AES-3: Glare Reduction;</b> <b>MM AES-4: Lake Street Pole Placement and Landscaping.</b>
<b>Impact AES-4:</b> Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	<b>MM AES-3: Glare Reduction;</b> <b>MM AES-5: Night Lighting during Construction.</b>
<b>Agriculture and Forestry</b>	
<b>Impact AG-1:</b> Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the FMMP of the California Resources Agency, to non-agricultural use.	<b>Project Commitment I: Agricultural Uses.</b>
<b>Air Quality</b>	
<b>Impact AQ-2:</b> Violate any air quality standard or contribute substantially to an existing or projected air quality violation.	<b>Project Commitment J: Air Emissions Controls;</b> <b>MM AQ-1: Minimize NO<sub>x</sub> and PM emissions from Off-road Diesel Powered Construction Equipment;</b> <b>MM AQ-2: Oxides of Nitrogen (NO<sub>x</sub>) Credits;</b> <b>MM AQ-3: Dust Control Plan.</b>
<b>Impact AQ-3:</b> Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).	<b>Project Commitment J: Air Emissions Controls;</b> <b>MM AQ-1: Minimize NO<sub>x</sub> and PM Emissions from Off-road Diesel Powered Construction Equipment;</b> <b>MM AQ-2: Oxides of Nitrogen (NO<sub>x</sub>) Credits;</b> <b>MM AQ-3: Dust Control Plan.</b>
<b>Impact AQ-5:</b> Create objectionable odors affecting a substantial number of people.	<b>MM AQ-4: Odor Reduction at Staging Yard VIG13.</b>
<b>Biological Resources</b>	
<b>Impact BR-1:</b> Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS).	<b>Project Commitment B: Worker Environmental Awareness Plan;</b> <b>Project Commitment C: Raptor Protection on Power Lines;</b> <b>Project Commitment D: Habitat Restoration and Revegetation Plan;</b>

**Table 5-1 Project Impacts with Applicable PCs and Mitigation Measures**

Impact	Project Commitment (PC) or Mitigation Measure (MM)
	<p>Project Commitment H: Noise Control;</p> <p>Project Commitment L: San Diego Ambrosia;</p> <p>Project Commitment M: ARL Land;</p> <p>Project Commitment N: Wildlife Movement;</p> <p>MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas;</p> <p>MM BR-2: Preconstruction Surveys;</p> <p>MM BR-3: Biological Monitoring During Construction;</p> <p>MM BR-4: Limit Removal of Native Vegetation Communities and Trees;</p> <p>MM BR-5: California Gnatcatcher Protection Measures;</p> <p>MM BR-6: Oak Tree Protection Measures;</p> <p>MM BR-7: Habitat Restoration and Revegetation Plan Requirements;</p> <p>MM BR-8: Special Status Plant Avoidance and Mitigation Measures;</p> <p>MM BR-9: Invasive Plant Control Measures;</p> <p>MM BR-10: Prevent Wildlife Entrapment;</p> <p>MM BR-11: Migratory Birds and Raptors Impact Reduction Measures;</p> <p>MM BR-12: Burrowing Owl Impact Reduction Measures;</p> <p>MM BR-13 Trash Abatement;</p> <p>MM BR-14: Protection of Special Status Species on Castle and Cooke Land;</p> <p>MM BR-18: Implementation of All Project Commitments.</p>
<p><b>Impact BR-2:</b> Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS.</p>	<p>Project Commitment B: Worker Environmental Awareness Plan;</p> <p>Project Commitment D: Habitat Restoration and Revegetation Plan;</p> <p>MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas;</p> <p>MM BR-2: Preconstruction Surveys;</p> <p>MM BR-3: Biological Monitoring During Construction;</p> <p>MM BR-4: Limit Removal of Native Vegetation Communities and Trees;</p> <p>MM BR-6: Oak Tree Protection Measures;</p>

**Table 5-1 Project Impacts with Applicable PCs and Mitigation Measures**

Impact	Project Commitment (PC) or Mitigation Measure (MM)
	<p>MM BR-7: Habitat Restoration and Revegetation Plan Requirements;</p> <p>MM BR-9: Invasive Plant Control Measures.</p>
<p><b>Impact BR-3:</b> Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.</p>	<p>MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas;</p> <p>MM BR-15: Stormwater Pollution Prevention Plan (SWPPP).</p>
<p><b>Impact BR-4:</b> Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.</p>	<p>Project Commitment B: Worker Environmental Awareness Plan;</p> <p>MM BR-7: Habitat Restoration and Revegetation Plan Requirements;</p> <p>MM BR-10: Prevent Wildlife Entrapment;</p> <p>MM BR-11: Migratory Birds and Raptors Impact Reduction Measures;</p> <p>MM BR-12: Burrowing Owl Impact Reduction Measures.</p>
<p><b>Impact BR-6:</b> Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state HCP.</p>	<p>MM BR-6: Oak Tree Protection Measures;</p> <p>MM BR-7: Habitat Restoration and Revegetation Plan Requirements;</p> <p>MM BR-8: Special Status Plant Avoidance and Mitigation Measures;</p> <p>MM BR-11: Migratory Birds and Raptors Impact Reduction Measures;</p> <p>MM BR-12: Burrowing Owl Impact Reduction Measures.</p>
<b>Cultural Resources</b>	
<p><b>Impact CUL-1:</b> Substantial adverse change in the significance of an historical resource.</p>	<p>Project Commitment B: Worker Environmental Awareness Plan;</p> <p>MM CR-1a: Ensure Preconstruction Survey Coverage of All Work Areas and Staging Areas;</p> <p>MM CR-1b: Avoid Impacts to Known and Undiscovered Historic Resources and Unique Archaeological Resources (except for site P33- 000714);</p> <p>MM CR-2: Monitor Ground Disturbing Activities (includes Native American Monitoring);</p> <p>MM CR-6: Avoid Impacts to Contributing Elements of P33000714.</p>
<p><b>Impact CUL-2:</b> Substantial adverse change in the significance of an archaeological resource</p>	<p>MM CR-4: Monitor Paleontologically Sensitive Area;</p> <p>MM CR-5: Follow Paleontological Resource Discovery Protocol;</p> <p>MM CR-7: Follow Necessary Procedures for Unanticipated Discovery of Human Remains.</p>

**Table 5-1 Project Impacts with Applicable PCs and Mitigation Measures**

Impact	Project Commitment (PC) or Mitigation Measure (MM)
<b>Geology, Soils, and Mineral Resources</b>	
<b>Impact GE-1:</b> Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking seismic-related ground failure including liquefaction, and landslides. .	<p><b>Project Commitment B: Worker Environmental Awareness Plan;</b></p> <p><b>Project Commitment D: Habitat Restoration and Revegetation Plan;</b></p> <p><b>Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.</b></p>
<b>Impact GE-2:</b> Result in substantial soil erosion or the loss of topsoil.	<p><b>Project Commitment D: Habitat Restoration and Revegetation Plan;</b></p> <p><b>MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs);</b></p> <p><b>Project Commitment E: Grading Plan.</b></p>
<b>Impact GE-3:</b> Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.	<b>Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.</b>
<b>Impact GE-4:</b> Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.	<b>Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.</b>
<b>Greenhouse Gases</b>	
<b>No Applicable PCs or MMs</b>	
<b>Hazards and Hazardous Materials</b>	
<b>Impact HZ-1:</b> Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	<p><b>Project Commitment B: Worker Environmental Awareness Plan;</b></p> <p><b>Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards;</b></p> <p><b>MM BR-15: Stormwater Pollution Prevention Plan (SWPPP);</b></p> <p><b>MM WQ-1: Blasting Plan and Best Management Practices;</b></p> <p><b>MM HZ-2: Contaminated Soil/ Groundwater Contingency Plan.</b></p>
<b>Impact HZ-2:</b> Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	<b>MM HZ-3: Contacting Affected Landowners Regarding Underground Facilities.</b>
<b>Impact HZ-3:</b> Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.	<p><b>Project Commitment B: Worker Environmental Awareness Plan;</b></p> <p><b>Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards;</b></p> <p><b>MM BR-15: Stormwater Pollution Prevention Plan (SWPPP);</b></p>

**Table 5-1 Project Impacts with Applicable PCs and Mitigation Measures**

Impact	Project Commitment (PC) or Mitigation Measure (MM)
	<p><b>MM WQ-1: Blasting Plan and Best Management Practices;</b></p> <p><b>MM HZ-2: Contaminated Soil/ Groundwater Contingency Plan.</b></p>
<p><b>Impact HZ-4:</b> Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.</p>	<p><b>MM HZ-2: Contaminated Soil/Groundwater Contingency Plan.</b></p>
<p><b>Impact HZ-8:</b> Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.</p>	<p><b>MM HZ-4: Fire Control and Emergency Response</b></p>
<p><b>Hydrology and Water Quality</b></p>	
<p><b>Impact WQ-1:</b> Violate any water quality standards or waste discharge requirements.</p>	<p><b>Project Commitment B: Worker Environmental Awareness Plan;</b></p> <p><b>Project Commitment D: Habitat Restoration and Revegetation Plan;</b></p> <p><b>Project Commitment E: Grading Plan;</b></p> <p><b>Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards;</b></p> <p><b>MM BR-15: Stormwater Pollution Prevention Plan (SWPPP);</b></p> <p><b>MM BR-7: Habitat Restoration and Revegetation Plan Requirements;</b></p> <p><b>MM WQ-1: Blasting Plan and Best Management Practices;</b></p> <p><b>MM WQ-2: Drainage Crossing Procedures and Practices;</b></p> <p><b>MM WQ-3: Design of Access Roads with Erosion Control Measures;</b></p> <p><b>MM WQ-4: Disposal of Groundwater from Dewatering Excavations.</b></p>
<p><b>Impact WQ-3:</b> Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.</p>	<p><b>Project Commitment D: Habitat Restoration and Revegetation Plan;</b></p> <p><b>Project Commitment E: Grading Plan;</b></p> <p><b>The Riverside County Flood Control and Water Conservation District shall be consulted regarding grading plans for construction and operation of the proposed projects;</b></p> <p><b>MM BR-7: Habitat Restoration and Revegetation Plan Requirements;</b></p> <p><b>MM WQ-2: Drainage crossing procedures and practices;</b></p>

**Table 5-1 Project Impacts with Applicable PCs and Mitigation Measures**

Impact	Project Commitment (PC) or Mitigation Measure (MM)
	MM WQ-3: Design of access roads with erosion control measures.
Impact WQ-4: Expose people or structures to a significant risk of inundations by seiche, tsunami, or mudflow.	MM BR-7: Habitat Restoration and Revegetation Plan Requirements; MM WQ-3: Design of Access Roads with Erosion Control Measures; MM WQ-5: Maintain Capacity and Connectivity of Drainages; MM WQ-6: Avoid Impeding MDP Implementation and Function.
Impact WQ-7: Place within a 100-year flood hazard area structures which would impede or redirect flood flows.	MM WQ-5: Maintain capacity and connectivity of drainages.
Impact WQ-8: Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.	MM HZ-4: Fire Control and Emergency Response.
Impact WQ-9: Expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow.	Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.
<b>Land Use and Planning</b>	
Impact LU-2: Conflict with applicable plans, policies, or regulations.	MM BR-6: Oak Tree Protection Measures; MM BR-7: Habitat Restoration and Revegetation Plan Requirements; MM BR-8: Special Status Plant Avoidance and Mitigation Measures; MM BR-11: Migratory Birds and Raptors Impact Reduction Measures; MM BR-12: Burrowing Owl Impact Reduction Measures.
<b>Mineral Resources</b>	
No Applicable PCs or MMs	
<b>Noise and Vibration</b>	
Impact NV-1: Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies	Project Commitment H: Noise Control; MM NV-1: Construction Noise Reduction Measures.
Impact NV-2: Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.	Project Commitment H: Noise Control; MM VIG NV-2: Blasting Vibration Control Measures.
Impact NV-4: Substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project	Project Commitment H: Noise Control; MM NV-1 Construction and Maintenance Noise Reduction Measures; MM NV-2 Blasting Vibration Control Measures.
<b>Population and Housing</b>	
No applicable PCs or MMs	

**Table 5-1 Project Impacts with Applicable PCs and Mitigation Measures**

Impact	Project Commitment (PC) or Mitigation Measure (MM)
<b>Public Services and Utilities</b>	
<b>Impact PS-1:</b> Result in substantial adverse physical impacts on governmental facilities or from the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following: (1) fire protection, (2) police protection, (3) schools, (4) parks, or (5) other public facilities.	<b>MM HZ-4: Fire Control and Emergency Response.</b>
<b>Impact PS-3:</b> Require or result in the construction of new storm water drainage facilities or expansion of existing facilities.	<b>Project Commitment E: Grading Plan;</b> <b>The Riverside County Flood Control and Water Conservation District shall be consulted regarding grading plans for construction and operation of the proposed projects;</b> <b>Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards;</b> <b>MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas.</b>
<b>Recreation</b>	
<b>No applicable PCs or MMs</b>	
<b>Transportation and Traffic</b>	
<b>Impact TT-1:</b> Conflict with an applicable plan, ordinance or policy establishing a measure 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.	<b>MM TT-1: Traffic Management and Control Plan.</b>
<b>Impact TT-2:</b> Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.	<b>MM TT-2: Heavy Vehicle Traffic Restrictions;</b> <b>MM TT-3: Highway Closure Plan.</b>
<b>Impact TT-3:</b> 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.	<b>Project Commitment G: Aircraft Flight Path Safety Provisions and Consultations;</b> <b>MM TT-4: Helicopter Lift Plan.</b>
<b>Impact TT-4:</b> Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	<b>MM TT-1: Traffic Management and Control Plan;</b> <b>MM TT-6: Road Damage Repair.</b>
<b>Impact TT-5:</b> Result in inadequate emergency access.	<b>MM TT-7: Emergency Service Provider Notification.</b>
<b>Impact TT-6:</b> Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.	<b>MM TT-1: Traffic Management and Control Plan.</b>

**Table 5-1 Project Impacts with Applicable PCs and Mitigation Measures**

Impact	Project Commitment (PC) or Mitigation Measure (MM)
<b>Tribal Cultural Resources</b>	
No applicable PCs or MMs	
<b>Utilities and Service Systems</b>	
No applicable PCs or MMs	

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
<b>Aesthetics</b>			
<p><b>Impact AES-2:</b> Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway.</p>		Verify preparation and implementation of landscaping and irrigation plan	After construction
	<p><b>Project Commitment D: Habitat Restoration and Revegetation Plan.</b></p>	Verify preparation and implementation of habitat restoration and revegetation plan	Prior to Construction and after construction
	<p><b>MM AES-1: Staging Area Screening.</b> Staging areas will be screened with perimeter screening fences at least 8 feet tall. Perimeter screening fences will be dark in color and covered with a dark-colored (e.g., dark green, brown, or black) fabric or other material that provides at least 50 percent screening.</p>	Verify staging areas are screened	During construction
	<p><b>MM AES-2: Segment VIG2 Wood Poles and Undergrounding.</b> 115-kV Segment VIG2 shall be placed on wood poles with the exception of an approximately 1.5-mile section that will be placed underground between Crompton Road and Conard Avenue.</p>	Verify placement of subtransmission line	Prior to, during, and post construction
		Verify implementation of visual treatments as recommended by a CA RLA	Prior to, during, and post construction
		Verify implementation of visual treatments	Prior to, during, and post construction

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
<p><b>Impact AES-3:</b> Substantially degrade the existing visual character or quality of the site and its surroundings.</p>	<p><b>Project Commitment D: Habitat Restoration and Revegetation Plan.</b> <b>MM AES-1: Staging Area Screening.</b></p>	See above	See above
	<p><b>MM AES-3: Glare Reduction.</b> To reduce glare from components of the project, reduce color contrast between the project components and the surrounding landscape, and visually unify the project components with the surrounding landscape, SCE shall use non-specular conductor and guy wire for all powerlines installed as part of the projects. Only use lightweight steel, hybrid, guy, and TSPs and LSTs with a galvanized steel that has been treated to create a dulled finish (unless otherwise required by MM AES-7 or MM AES-8).</p>	Verify implementation of glare reduction measures	Prior to, during, and post construction
	<p><b>MM AES-4: Lake Street Pole Placement and Landscaping.</b> Poles installed along Lake Street for 115-kV Segment VIG5 and for the Fogarty-Ivyglen kV Subtransmission line shall adhere to the following requirements: Poles shall be set back an average of 20 feet from Lake Street's edge of pavement. Wood or galvanized steel poles with surface coatings with appropriate colors, finishes and textures to most effectively blend the structures with the visible backdrop landscape shall be used along Lake Street. SCE shall submit preferences for specific colors, finishes, and textures to the CPUC for approval. SCE shall plant trees with a maximum height and spread of 25 feet at maturity and a minimum height of 10 feet at planting, large shrubs, and other plants within the setback area between the subtransmission alignment and the Lake Street edge of pavement along the segment. Plantings shall be placed at intervals and in locations to maximize screening of lower portions of the transmission structures in views from the road. Plantings shall be drought tolerant. SCE shall coordinate with the City of Lake Elsinore prior to finalizing landscaping design. SCE shall submit the design to the CPUC, along with evidence that SCE has coordinated with the City of Lake Elsinore, prior to pole erection along Lake Street.</p>	Verify pole placement and landscaping	Prior to, during, and post construction
		Verify pole material	Prior to, during, and post construction
		Verify placement of subtransmission line	Prior to, during, and post construction

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
<p><b>Impact AES-4:</b> Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.</p>	<p><b>MM AES-3: Glare Reduction.</b></p>	<p>See above</p>	<p>See above</p>
	<p><b>MM AES-5: Night Lighting during Construction.</b> To minimize the effect on any nearby sensitive receptors, lighting for construction activities, staging areas, and maintenance activities will be the minimum necessary to ensure safety and security for nighttime activities. All lighting used for nighttime construction activities will be oriented downward and shielded to eliminate off-site light spill at times when the lighting is in use. Any new safety and security lighting at staging areas or other areas established for long-duration construction activities, such as laydown areas, will be motion-activated or use timers to reduce impacts of nighttime lighting.</p>	<p>Verify utilization of night lighting</p>	<p>During construction</p>
<p><b>Agriculture and Forestry</b></p>			
<p><b>Impact AG-1:</b> Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the FMMP of the California Resources Agency, to non-agricultural use.</p>	<p><b>Project Commitment I: Agricultural Uses:</b></p>	<p>Verify continued agricultural use</p>	<p>Post construction</p>
<p><b>Air Quality</b></p>			
<p><b>Impact AQ-2:</b> Violate any air quality standard or contribute substantially to an existing or projected air quality violation.</p>	<p><b>Project Commitment J: Air Emissions Controls.</b></p>	<p>Verify utilization of fugitive dust control measures</p>	<p>During construction</p>
	<p><b>MM AQ-1: Minimize NO<sub>x</sub> and PM emissions from off-road diesel-powered construction equipment.</b> To the extent available, SCE shall utilize off-road diesel-powered construction equipment with engines greater than 150 horsepower that comply with Tier 4 interim or Tier 4 road emission standards (Tier 4 Standards). In the event that equipment with a Tier 4 Standards compliant engine is not available, that equipment shall be operated with tailpipe retrofit controls that reduce NO<sub>x</sub> and PM to no more than Tier 3 emission standards (Tier 3 Standards) levels. Equipment with a non-Tier 4 Standards compliant engine shall be utilized only when SCE has made an unsuccessful good faith effort to locate equipment with a Tier 4 Standards compliant engine in the Valley-Ivyglen Project vicinity (defined as within 200 miles of the applicable project site). Each such good faith effort shall be documented with written correspondence (or signed statement and electronic mail) by the appropriate construction contractor, along with written correspondence from at least two construction equipment rental firms within the defined vicinity confirming the unavailability of</p>	<p>Verify utilization of Tier 4 Standard equipment</p>	<p>During construction</p>

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p>equipment with a Tier 4 Standards compliant engine. SCE shall make available to the California Public Utilities Commission (CPUC) a copy of the certified tier specification, best available control technology documentation, and/or CARB or SCAQMD operating permit for each piece of construction equipment, as applicable, at the time the equipment is mobilized. In addition, SCE shall: Maintain construction equipment according to manufacturing specifications and use low-emissions equipment; Reduce emissions of PM and other pollutants by using, whenever feasible, alternative clean fuel technology to power vehicles and equipment instead of gasoline- or diesel-powered engines (e.g., electric, hydrogen fuel cell, propane, natural gas, or compressed natural gas-powered equipment with oxidation catalysts); Ensure that all construction equipment is properly tuned and maintained and shut off when not in direct use; Prohibit engine tampering to increase horsepower; Locate engines, motors, and equipment as far as possible from residential areas and other sensitive receptors, such as schools, daycare centers, and hospitals; Encourage carpooling to and from staging yards to construction sites to minimize private vehicle use; Minimize construction-related transport of workers and equipment including trucks; and Require that on-road vehicles utilized during construction meet CARB fleet regulations.</p>		
	<p><b>MM AQ-2: Oxides of Nitrogen (NO<sub>x</sub>) Credits.</b> The remaining emissions of NO<sub>x</sub> resulting from construction of the proposed projects shall be mitigated through the purchase of Regional Clean Air Incentive Market Trading Credits (RTCs), Mobile Source Emission Reduction Credits (MSERCs), or a combination of RTCs and MSERCs for every pound of NO<sub>x</sub> in excess of the SCAQMD regional significance threshold of 100 pounds per day, as measured per project. The total amount of NO<sub>x</sub> RTCs to be purchased shall be calculated once the construction schedules for each project are finalized. SCE shall purchase and submit documentation of purchase of the required RTCs to the SCAQMD prior to the start of construction of each project. SCE shall also track actual daily emissions during construction of each project according to a monitoring plan, which shall require keeping records of equipment and vehicle usage for each project.</p> <p><b>MM AQ-3: Dust Control Plan.</b> SCE shall prepare a Dust Control Plan based on final engineering and pursuant to Rule 403 of the SCAQMD. SCE shall submit the Plan to the CPUC prior to commencement of ground</p>	<p>Verify the purchase of NO<sub>x</sub> credits</p> <p>Verify utilization of fugitive dust control measures</p>	<p>Prior to and after construction</p> <p>During construction</p>

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	disturbing activities.	Verify the purchase of VOC credits	Prior to and after construction
<b>Impact AQ-3:</b> Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).	<b>Project Commitment J: Air Emissions Controls. MM AQ-1: Minimize NOx and PM emissions from off-road diesel-powered construction equipment. MM AQ-2: Oxides of Nitrogen (NOx) Credits. MM AQ-3: Dust Control Plan.</b>	See above	See above
<b>Impact AQ-4:</b> Expose sensitive receptors to substantial pollutant concentrations		See above	See above
<b>Impact AQ-5:</b> Create objectionable odors affecting a substantial number of people.	<b>MM AQ-4: Odor Reduction at Staging Yard VIG13.</b> At Staging Yard VIG13, heavy equipment use shall be conducted at least 36 feet away from the Southern California Online Academy property.	Verify use of heavy equipment	During construction

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
<b>Biological Resources</b>			
<p><b>Impact BR-1:</b> Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.</p>	<p><b>Project Commitment B: Worker Environmental Awareness Plan.</b></p>	<p>Verify the preparation and implementation of worker environmental awareness plan</p>	<p>Prior to and during construction</p>
	<p><b>Project Commitment C: Raptor Protection on Power Lines.</b></p>	<p>Verify implementation of APLIC recommendations</p>	<p>Prior to and during construction</p>
	<p><b>Project Commitment D: Habitat Restoration and Revegetation Plan.</b></p>	<p>See above</p>	<p>See above</p>
	<p><b>Project Commitment H: Noise Control.</b></p>	<p>Verify implementation of noise control measures</p>	<p>During construction</p>
	<p><b>Project Commitment I: San Diego Ambrosia.</b></p>	<p>Verify implementation of measure</p>	<p>During construction.</p>
	<p><b>Project Commitment J: ARL Land.</b></p>	<p>Verify restoration. Confirm that ARL equivalency analysis has been submitted as part of MSHCP PSE submittal.</p>	<p>After construction.</p>
	<p><b>Project Commitment K: Wildlife Movement.</b></p>	<p>Review retaining wall design to verify that wildlife movement is not restricted.</p>	<p>Prior to construction of retaining wall.</p>
	<p><b>MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas.</b> Vehicular traffic (including movement of all equipment) shall be restricted to approved access roads and established construction areas shown in Figure 2.6 of the EIR. These areas shall be delineated in the field with flagging and signage. If disturbance is required outside the established construction areas, CPUC notification and approval shall be required. Sensitive resources such as waterbodies, oak trees, and special status plant populations shall be clearly marked for avoidance with flagging and signage. Nighttime lighting, if necessary adjacent to aquatic areas, shall be shielded away from these areas to prevent impacts on aquatic wildlife.</p>	<p>Verify avoidance of wetlands</p>	<p>During construction</p>

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p><b>MM BR-2: Preconstruction Surveys.</b> Qualified biologists shall conduct preconstruction surveys within two weeks of the start of construction in any given project construction area. Surveyors shall focus on areas proposed for vegetation removal or ground disturbance that are within habitat that a qualified biologist has deemed suitable for sensitive species. As part of preconstruction surveys, the composition of the vegetation community shall be surveyed to establish baseline conditions prior to construction and to guide post-construction restoration efforts. The surveys shall be conducted to determine the presence of special status plants, noxious weeds, and all wildlife species for the purpose of preventing direct loss of vegetation and wildlife and the spread of noxious plant species. Preconstruction surveys shall be performed for each discrete work area prior to the start of ground disturbance, or if work has lapsed for longer than 30 days. Biologists shall document survey results in a daily logbook or report.</p>	Verify the completion of survey	Prior to construction
	<p><b>MM BR-3: Biological Monitoring During Construction.</b> In areas where sensitive resources may be impacted by construction activities, a qualified biological monitor shall be present during construction activities. The monitor shall have the authority to temporarily stop work that he or she determines to be threatening to a special status wildlife or plant species or nesting bird. The monitor shall determine appropriate action, and work will resume once the monitor determines there is no longer a threat to the special status species or approval has been obtained from the appropriate wildlife agencies or CPUC. Biologists shall document monitoring observations in a daily logbook.</p>	Verify the monitoring of construction activities	During construction
	<p><b>MM BR-4: Limit Removal of Native Vegetation Communities and Trees.</b> The removal of native vegetation and trees shall be limited to the minimum practicable area required for construction of the project. Grading, grubbing, graveling, or paving shall only occur where required for construction and operations. SCE shall use temporary staging areas in a way that facilitates post-construction restoration and shall restore these areas to as close to pre-construction conditions as possible, or to the conditions agreed upon between SCE and landowner.</p>	Verify the minimization of native vegetation removal	During construction
	<p><b>MM BR-5: California gnatcatcher protection measures.</b> In accordance with the MSHCP, removal of Riversidean sage scrub habitat will not occur during the coastal California gnatcatcher breeding season. (February 15 to August 15). Should nesting coastal California gnatcatcher be observed</p>	Verify the implementation of protection measures	During construction

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p>during preconstruction surveys, outside of the breeding season, vegetation removal and other construction-related disturbance shall not commence within the applicable nest buffer area, as identified in the projects' Nesting Bird Management Plan, until the nest is determined to be inactive.</p>		
	<p><b>MM BR-6: Oak tree protection measures.</b> This measure applies to oak trees in all project areas. Preventive measures shall be taken during construction activities to minimize impacts in the protected zone of each oak tree. The protected zone commences at a point 5 feet outside the dripline and extends inward to the trunk of the tree. All work conducted in the protected zone of oak trees shall be performed using hand implements and in the presence of a certified arborist. If it is determined that oak tree removal is necessary, SCE shall relocate oak trees to a place outside of the area of anticipated impacts under the direction of the certified arborist. If SCE cannot feasibly relocate oak trees that are removed, 1-gallon oak trees shall be planted at a 12:1 ratio within the appropriate habitat to replace removed trees. These replacement trees shall be indigenous coast live oak trees that have been grown in a natural form (no topping or street tree forming). SCE shall be responsible for monitoring and maintaining the relocated or replacement trees for a minimum of two years (to include at least two complete California rainy seasons, here defined as the period of the year from November – May). In addition, the following minimization measures shall be implemented under the direction of the certified arborist: Equipment, materials, and vehicles shall not be stored, parked, or operated within the protected zone of an oak tree, except on sites approved for this use by a certified arborist. Removal of the natural leaf mulch within the protected zone of oak trees is prohibited except where absolutely necessary. All trees not approved for removal shall be fenced or flagged for avoidance and to designate the protected zone. Any pruning, including removal of dead wood, shall be performed in compliance with the latest American National Standards Institute pruning standards by a certified arborist (or certified tree worker).</p>	<p>Verify the implementation of protection measures</p>	<p>During construction</p>
	<p>Any root-pruning required within the protected zone of an oak shall be limited to the minimum amount necessary. All root-pruning shall consist of clean, 90-degree angle cuts utilizing sharp hand tools. Any major roots (2 inches or greater in diameter) encountered shall be preserved to the extent possible and wrapped in moist burlap until the soil is replaced. Soil shall be</p>		

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p>replaced around preserved roots as soon as possible. To evaluate whether or not this type of mitigation is successful over the long- term, the relocated oak trees and replacement oaks will be revisited by a certified arborist in the fifth, tenth, and fifteenth years after relocation or planting to assess the survival/mortality rate of these oaks, and to evaluate the health of the surviving individuals. SCE will prepare an initial report on the implementation of this measure after the second year of monitoring and maintenance has been completed. A Final Report will be prepared after the Year-15 assessment has been carried out; the Final Report will be submitted to the CPUC, and copies shall be sent to the USFWS (Palm Springs Fish and Wildlife Office), to the CDFW (Inland/Desert Regional Office), and to the California Native Plant Society's Conservation Program staff.</p>		
	<p><b>MM BR-7: Habitat Restoration and Revegetation Plan Requirements.</b> Pursuant to Project Commitment D, SCE shall develop a Habitat Restoration and Revegetation Plan to address ground disturbance in all project areas. In addition to including the provisions set forth in Project Commitment D, the Habitat Restoration and Revegetation Plan shall detail topsoil segregation and conservation methodology; restoration of special status plant species habitat; vegetation removal and revegetation methods, including seed mixes, rates, and transplants; criteria to monitor and evaluate revegetation success; and alternative restoration and revegetation methods in the event that the revegetation success criteria are not initially reached. SCE shall implement the Habitat Restoration and Revegetation Plan until the restoration success criteria are achieved. Appropriate agencies (CPUC, USFWS, and CDFW) shall be consulted during the preparation of the Habitat Restoration and Revegetation Plan. A copy of the final Habitat Restoration and Revegetation Plan, along with documentation of agency review and incorporation of comments into the final version, shall be provided to the CPUC, the USFWS, and the CDFW for approval prior to the CPUC issuing a notice to proceed.</p>	<p>Verify the preparation and implementation of habitat restoration and revegetation plan</p>	<p>Prior to, during, and post construction</p>

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p><b>MM BR-8: Special Status Plant Avoidance and Mitigation Measures.</b> For project areas not covered by the MSHCP, SCE shall avoid the special status plant populations listed in Appendix G, Table 1. However, where avoidance is not feasible, special status plants in project work areas shall be identified in the field, and the following avoidance measures shall be implemented to minimize the possibility of inadvertent encroachment: A qualified biologist shall flag or otherwise mark special status plants. Construction crews will avoid direct or indirect impacts on these flagged areas. Should impacts on special status plants be unavoidable, SCE will implement the following measures: A qualified botanist shall determine if transplantation is feasible. If determined feasible, a qualified botanist shall develop and implement a transplantation plan in coordination with appropriate agencies (CDFW, USFWS, RCA). The special status plant transplantation plan shall identify a suitable transplant site, moving the plant material and seed bank to the transplant site, collecting seed material and propagating it in a nursery, and monitoring the transplant sites to document recruitment and survival rates. If transplantation is infeasible, SCE shall replace impacted special status plants at a 2:1 ratio within the project area within one year of the end of construction. Measures to restore special status plants shall be implemented in accordance with the Habitat Restoration and Revegetation Plan (MM BR-7).</p>	Verify the implementation of protection measures	During construction
	<p><b>MM BR-9: Invasive Plant Control Measures.</b> SCE shall develop an Invasive Plant Management Plan outlining measures to prevent the spread of invasive plants such as tamarisk (<i>Tamarix</i> sp.) and giant reed (<i>Arundo donax</i>) during construction of the projects. The Invasive Plant Management Plan shall include, but is not limited to, the following measures: All vehicles and equipment shall be cleaned prior to arrival at the work site. Straw or hay bales used for sediment barrier installations or mulch distribution shall be obtained from weed-free sources. The Invasive Plant Management Plan will be submitted to the CDFW and CPUC for review and comment no more than three months prior to the start of construction. A copy of the final Invasive Plant Management Plan, along with documentation of agency review (CDFW and CPUC) and incorporation of comments into the final version, shall be provided to the CPUC for approval prior to the CPUC issuing a notice to proceed.</p>	Verify the preparation and implementation of invasive plant management plan	Prior to and during construction
	<p><b>MM BR-10: Prevent Wildlife Entrapment.</b> In all project work areas, SCE</p>	Verify the prevention of	During

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p>shall install covers, ramps, and/or fencing to avoid trapping wildlife in excavations or trenches. Covers must be weighted at the edges or installed in a way that prevent wildlife from attempting to burrow beneath the cover. Fine-gauge fencing shall be used to prevent small animals from passing through the fence. Ramps with an angle of less than 45 degrees shall be utilized. SCE’s biological monitor will check open trenches and excavations for trapped wildlife each morning prior to the start of work on the trench or excavation. Trenches and excavations that are covered for more than one week will be inspected on a weekly basis. In addition, where retaining walls or another method of slope stabilization are required, the facility shall be sited, designed, and oriented to avoid impacts on the movement of native wildlife species and established wildlife corridors in coordination with the wildlife agencies (USFWS, CDFW, RCA).</p>	wildlife entrapment	construction
	<p><b>MM BR-11: Migratory Birds and Raptors Impact Reduction Measures.</b> SCE shall develop a Nesting Bird Management Plan in consultation with the USFWS and CDFW that outlines protective measures and BMPs that shall be employed in all project work areas to prevent disturbance of active nests. The final Plan shall be submitted to the CPUC for approval. The Nesting Bird Management Plan shall include the following components: species-specific buffer distances (including vertical buffers in areas where helicopters will be used) and conditions under which these buffer distances can be reduced, including concurrence by the CDFW, USFWS, and CPUC for special status species; dates of local breeding seasons during which nest surveys shall be conducted; preconstruction nest survey timing, methods, and surveyor qualifications; nest deterrent methods, including vegetation clearing; monitoring and reporting protocols during construction; protocols for determining whether a nest is active; protocols for documenting, reporting, and protecting active nests within construction areas; and avian monitor qualifications. If preconstruction survey protocols exist for a certain species, the Nesting Bird Management Plan shall incorporate these protocols. The survey area shall include the construction area, plus an additional distance large enough to accommodate the protective buffer of bird species likely to occur in proximity to the construction area. The Nesting Bird Management Plan shall further specify that active bird nests shall not be removed during breeding season unless the projects are expressly permitted to do so by the USFWS or CDFW; all</p>	Verify the preparation and implementation of nesting bird management plan	Prior to and during construction

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p>project-related nest failures shall be reported to the USFWS and CDFW; and the biological monitor shall halt work if he or she determines that active nests would be disturbed by construction activities. If construction begins during the breeding season (February 1 through August 31), the Nesting Bird Management Plan shall be submitted to the USFWS and CDFW for review and comment no less than two months prior to the start of construction, with the intent that the plan will be finalized no less than one months prior to the start of construction. A copy of the final Nesting Bird Management Plan, along with documentation of agency review (CDFW, USFWS, CPUC) and incorporation of comments into the final version, shall be provided to the CPUC for approval prior to the CPUC issuing a notice to proceed during the breeding season.</p>		
	<p><b>MM BR-12: Burrowing Owl Impact Reduction Measures.</b> To reduce impacts on burrowing owls, SCE shall implement the measures in all project work areas: Surveys for burrowing owls will be conducted by a qualified biologist within 30 days of construction during the non-breeding season and within 14 days of construction during the breeding season (February 1 through August 31) to confirm whether burrowing owls occupy the site. Surveys shall be performed throughout the project areas that contain suitable burrowing owl habitat, with a potential to be impacted by construction activities, plus an additional area extending 300 feet from the projects' boundaries. If an occupied burrow is identified, SCE shall adhere to buffer distances detailed in the <i>Staff Report on Burrowing Owl Mitigation</i> (CDFG 2012). The biologist will report all project-related impacts on burrowing owl to the appropriate resource agencies (CDFW and RCA). If appropriate buffers cannot be maintained and impacts on burrowing owls or occupied burrows are unavoidable, SCE shall develop and implement a Determination of Biologically Equivalent or Superior Preservation (DBESP), in compliance with MSHCP Section 6.3.2, and as approved by CDFW and RCA. The DBESP shall describe the compensatory measures that will be undertaken to address the loss of burrowing owl burrows within the project area. The compensatory mitigation shall be determined on a site-specific analysis but may include restoration of temporarily impacted habitat and acquisition and or enhancement of off-site mitigation lands as determined in consultation with CDFW. If, in following consultation with CDFW, it is determined that project activities require removal of occupied burrows,</p>	<p>Verify the implementation of protection measures</p>	<p>During construction</p>

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	eviction and burrow closure may be required to ensure against “take” of owls or nests. However, this will only occur after the preparation of a Burrowing Owl Exclusion Plan, as approved by CDFW.		
	<b>MM BR-13: Trash Abatement.</b> SCE shall keep project areas free of trash and debris. Food-related trash items shall be stored in enclosed containers and regularly removed from site.	Verify trash removal	During construction
	<b>MM BR-14: Protection of Special Status Species on Castle and Cooke Land.</b> SCE is entering into an agreement with the RCA, with USFWS and CDFW concurrence, to allow for coverage of the Valley-Ivyglen Project’s obligations under the MSHCP on Castle and Cooke property, which falls outside MSHCP boundaries and thus is exempt from mitigation under the MSHCP. If this agreement is finalized prior to the start of construction, it shall be in effect for the duration of the projects or until SCE opts out. Should SCE opt out of the MSHCP, or if this agreement with the RCA is not finalized, SCE shall implement the same or a greater level of species-specific avoidance, mitigation, restoration, and compensation measures as would have been required under the MSHCP. This may include additional consultation with USFWS and CDFW to obtain Incidental Take Authorization pursuant to the Federal California Endangered Species Acts. These additional measures would include MM BR-1, MM BR-4, and MM BR-8. <b>MM BR-18: Implementation of All Project Commitments.</b> SCE will implement all Project Commitments as stated in this EIR, except in cases where they are superseded or modified by Mitigation Measures. The Project Commitments will be incorporated into the Mitigation Monitoring and Compliance Reporting Program.	Verify the implementation of protection measures	During construction
		Verify the implementation of protection measures	During construction

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
<p><b>Impact BR-2:</b> Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS.</p>	<p><b>Project Commitment B: Worker Environmental Awareness Plan. Project Commitment D: Habitat Restoration and Revegetation Plan. MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas. MM BR-2: Preconstruction Surveys. MM BR-3: Biological Monitoring During Construction. MM BR-4: Limit Removal of Native Vegetation Communities and Trees. MM BR-6: Oak tree protection measures.</b></p>	<p>See above</p>	<p>See above</p>
	<p><b>MM BR-7: Habitat Restoration and Revegetation Plan Requirements. MM BR-9: Invasive Plant Control Measures.</b></p>		
<p><b>Impact BR-3:</b> Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.</p>	<p><b>MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas. MM BR-2: Preconstruction Surveys. MM BR-3: Biological Monitoring During Construction.</b></p> <p><b>MM BR-15: Stormwater Pollution Prevention Plan (SWPPP).</b> The SWPPP shall include Best Management Practices (BMPs) sufficient to acquire authorization under the Construction General Permit and protect waters in the project vicinity from sediment and other pollutants during construction. Per SCE, BMPs from the California Stormwater BMP Handbook that would be included in the SWPPP include but are not limited to WM-1 Material and Delivery Storage, WM-4 Spill Prevention and Control, WM-5 Solid Waste Management, WM-6 Hazardous Waste Management, WM-8 Concrete Waste Management, NS-9 Vehicle and Equipment Fueling, and NS-10 Vehicle and Equipment Maintenance. Verification of Construction General Permit authorization and the associated SWPPP shall be provided to the CPUC at least 15 days prior to start of construction. Updated SWPPPs shall be provided to the CPUC during construction upon request.</p>	<p>See above</p> <p>Verify the implementation of protection measures</p>	<p>See above</p> <p>During construction</p>
<p><b>Impact BR-4:</b> Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.</p>	<p><b>Project Commitment B: Worker Environmental Awareness Plan. MM BR-7: Habitat Restoration and Revegetation Plan Requirements. MM BR-10: Prevent Wildlife Entrapment. MM BR-11: Migratory Birds and Raptors Impact Reduction Measures. MM BR-12: Burrowing Owl Impact Reduction Measures.</b></p>	<p>See above</p>	<p>See above</p>
<p><b>Impact BR-6:</b> Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.</p>	<p><b>MM BR-6: Oak tree protection measures. MM BR-7: Habitat Restoration and Revegetation Plan Requirements.</b></p>	<p>See above</p>	<p>See above</p>

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<b>MM BR-8: Special Status Plant Avoidance and Mitigation Measures.</b> <b>MM BR-11: Migratory Birds and Raptors Impact Reduction Measures.</b> <b>MM BR-12: Burrowing Owl Impact Reduction Measures.</b>		
<b>Cultural Resources</b>			
<b>Impact CR-1:</b> Substantial adverse change in the significance of an historical or archaeological resource.	<b>Project Commitment B: Worker Environmental Awareness Plan.</b> <b>MM CR-1a: Ensure preconstruction survey coverage of all work areas and staging areas.</b> Prior to construction, SCE shall compare the limits of the work areas and staging areas to project maps that show where areas have been previously surveyed for cultural resources at the Intensive Cultural Resources Inventory level. SCE shall verify the proposed work areas and staging areas have been surveyed at the Intensive Cultural Resources Inventory level. An Intensive Cultural Resources Inventory level of survey is defined here as consisting of pedestrian surveys with transects spaced no farther apart than 15 meters except where field conditions such as exceptionally dense vegetation or steep slopes make walking transects difficult. In order to rely upon a prior survey for a work area, all areas that can be reasonably covered by transect surveys within such work area shall have been surveyed. If such a prior survey has been completed in the proposed work area or staging area, work can commence as follows: If no known resources are located in the work area or staging area, work or staging can proceed in the area. Previously unknown resources that are discovered during work activities shall be subject to MM CR-1b. If known resources are located in the work area or staging area, they must be handled pursuant to MM CR-1b. Previously unknown resources that are discovered during work activities shall be subject to MM CR-1b. If such a prior survey has not been completed in the proposed work area or staging area, then work may not commence until an Intensive Cultural Resources Inventory has been completed by a CPUC-approved archaeologist or cultural resources specialist and Native American tribal monitor(s) and reviewed and approved by the CPUC. If a resource is found during the survey, SCE shall adhere to MM CR-1b procedures for unanticipated resources.	See above  Verify completion of survey	See above  Prior to construction

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p><b>MM CR-1b: Avoid impacts to known and undiscovered historic resources and unique archaeological resources (except for site P33-000714).</b> SCE shall prepare a Cultural Resources Monitoring and Treatment Plan (CRMTP) for known and unknown resources that are eligible or potentially eligible for the California Register or are unique archaeological resources, except P33-000714, which is subject to MM CR-6. The CRMTP shall be reviewed and approved by the CPUC prior to the start of construction. To implement MM CR-1b SCE shall: Retain a qualified archaeologist who shall: prepare the CRMTP; oversee archaeological and Native American monitors; and evaluate discoveries and prepare Evaluation and Data Recovery Plans and subsequent reports. This archaeologist shall, at the minimum, meet the Secretary of Interior’s Professional Qualifications Standards for archaeology and be approved by the CPUC. Provide Native American Tribes that have expressed interest in the projects (Soboba and Pechanga) the opportunity to consult with the qualified archaeologist and provide input on the draft CRMTP during its preparation, including the Evaluation Plan and Data Recovery Plan. Upon completion of the draft CRMTP, Native American Tribes shall be given at least 30 days to provide input on the draft CRMTP. Evidence of consultation with the Tribes shall be submitted to the CPUC. Prepare the CRMTP, which shall include the following. <b>Mapping.</b> The CRMTP shall map all known California Register eligible or potentially eligible resources in and within 100 feet of work areas. Maps shall be updated as necessary to incorporate any new information obtained pursuant to MM CR-1a. <b>Environmentally Sensitive Areas (ESA) Delineation.</b> The CRMTP should describe how California Register eligible or potentially eligible resources will be delineated and avoided as ESAs during construction. ESAs containing cultural resources shall not be identified on the ground or on maps to be used by anyone other than the qualified archaeologist, Native American monitors, cultural resource monitors, or other cultural resource professionals. They shall be labeled on maps and with signage in the field as “environmentally sensitive areas.” The preferred method of mitigation in the CRMTP for known resources shall be total avoidance of the resource (preservation in place), per CEQA Guidelines section 15126.4(b)(3)(A). The preferred method of mitigation in the CRMTP for unanticipated resources shall be total avoidance (preservation in place). If avoidance is determined to be infeasible;</p>	<p>Verify the preparation and implementation of cultural resources monitoring and treatment plan</p>	<p>Prior to and during construction</p>

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p>SCE shall prepare a Data Recovery Plan. <b>Unanticipated resource discovery.</b> The CRMTP shall contain a description of procedures to be used if unanticipated cultural resources are discovered during construction. The CRMTP shall require that work shall be temporarily halted within 100 feet of the resource, appropriate temporary protective barriers shall be installed along with signage identifying the area only as an “environmentally sensitive area” and forbidding entry into the area by all but authorized personnel, and the qualified archaeologist and the CPUC shall be notified. No work will resume in the area until the qualified archaeologist and the CPUC agree to an appropriate buffer or until mitigation has been completed. The preferred method of mitigation in the CRMTP shall be total avoidance of the resource (preservation in place), per CEQA Guidelines section 15126.4(b)(3)(A). If the resource can be completely avoided, no additional mitigation is necessary. If the resource cannot be completely avoided, the qualified archaeologist shall then follow the procedures delineated for resources where it is not known whether the resource is historical. If an unanticipated resource is avoided, it shall nonetheless be recorded on California Department of Parks and Recreation 523 forms and filed at the Eastern Information Center. <b>Determination if a resource is an historical resource.</b> The qualified archaeologist, in consultation with the CPUC, shall determine if there is a potential for the resource to be an historical resource. If there is no potential for the resource to qualify as an historical resource, work shall resume after CPUC concurrence. The CRMTP shall include a framework for evaluating cultural resources. If there is a potential for the resource to be an historic resource, the qualified archaeologist shall prepare an Evaluation Plan. <b>Evaluation Plan.</b> The resource-specific Evaluation Plan shall detail the procedures to be used to determine if the discovery is an historical resource. The Evaluation Plan shall include sufficient discussion of background and context to allow the evaluation of the resource against the historic resource criteria. It shall include a description of procedures to be used in the gathering of information to allow the evaluation. These techniques may include (but are not limited to): excavation, written documentation, interviews, and/or photography. For archaeological resource testing, the Evaluation Plan should describe the archaeological testing procedures, including, but not limited to: surface collection (if surface artifacts are discovered), test</p>		

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p>excavations (including type, number, and location of test pits and/or trenches), analysis methods, and reporting procedure. The Evaluation Plan shall be submitted to CPUC for review. Once approved, the Evaluation Plan shall be implemented in the field. The report resulting from this work shall include evaluation of the discovery, based on the significance criteria set forth in the Evaluation Plan, indicating if it is an historic resource. If the discovery is not found to be an historic resource, and CPUC concurs with that determination, protective barriers may be removed, and work may proceed in the area of the discovery. If the discovery is determined to be an historic resource, SCE shall prepare a Data Recovery Plan. <b>Data Recovery Plan.</b> Data recovery plans for historic resources that cannot be fully avoided shall be prepared in accordance with CEQA Guidelines section 15126.4(b)(3)(C) and PRC section 21083.2, as applicable. The Data Recovery Plan shall outline how the recovery of data from the resource will mitigate impacts to that resource to below a level of significance. The Data Recovery Plan shall describe the level of effort, including numbers and kinds of excavation units to be dug, excavation procedures, laboratory methods, samples (e.g., pollen, sediment, as appropriate) to be collected and analyzed, analysis techniques that will yield information relevant to the aspects of the site that make it an historic resource, and reporting procedure. This plan shall be submitted to the CPUC for review and approval. Once approved, SCE shall implement the approved plan. Once the data recovery field work is complete, a Data Recovery Field Memo shall be prepared. <b>Data Recovery Field Memo.</b> Following implementation of the Data Recovery Plan, the Data Recovery Field Memo shall be prepared. The Data Recovery Field Memo shall briefly describe the data recovery procedures in the field and summarize (at a field catalog level) the materials recovery. The Data Recovery Field Memo shall also identify the number and kind of samples recovered that are appropriate for special analyses, including radiocarbon dating, obsidian sourcing, pollen analysis, microbotanical analysis, and others, as applicable. The Data Recovery Field Memo shall be submitted to CPUC for review and approval. Once the Data Recovery Field Memo has been approved, protective barriers may be removed, and work may proceed in the area of the discovery. If the Data Recovery Field Memo concerns Native American resources or archaeological or prehistoric resources, the Data Recovery Field Memo</p>		

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p>shall also be submitted to the Native American Tribe per the procedures outlined in the Data Recovery Plan. A Data Recovery Report shall then be prepared. <b>Data Recovery Report.</b> Within 90 days of submittal of the Data Recovery Field Memo, a Data Recovery Report shall be prepared. The Data Recovery Report shall present the results of the data recovery program, including a description of field methods, location and size of excavation units, analysis of materials recovered (including results of any special analyses conducted), and conclusions drawn from the work. The Data Recovery Report shall also indicate where artifacts, samples, and documentation resulting from the data recovery program will be curated. The Data Recovery Report shall specify that the curation facility meets the requirements of 36 CFR 79. The Data Recovery Report shall be submitted to the CPUC for review and approval. Once approved, the Data Recovery Report shall be filed with the Eastern Information Center. All impacted known resources and all unanticipated resources shall be recorded on California Department of Parks and Recreation 523 forms and filed at the Eastern Information Center with the Data Recovery Report. If the Data Recovery Report concerns Native American resources or archaeological or prehistoric resources, the Data Recovery Report shall also be submitted to the Native American Tribe per the procedures outlined in the Data Recovery Plan. The CRMTP shall include a summary of the California laws regarding the discovery of human remains, including: CEQA Guidelines section 15064.5(e); PRC sections 5097.94, 5097.98, and 5097.99; and California Health and Safety Code section 7050.5. In addition, the plan shall include the contact information for the Riverside County Medical Examiner. The CRMTP shall specify that the curation facility, where artifacts, samples, and documentation resulting from the data recovery program shall be curated, meets the requirements of 36 CFR 79.</p>		

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p><b>MM CR-2: Monitor ground disturbing activities (includes Native American monitoring).</b> Archaeological monitoring shall be required for ground disturbing activities in areas with moderate to high archaeological sensitivity. In some areas where previous disturbance has occurred, spot checking may be appropriate and will be defined in the CRMTP. The archaeological monitor(s) shall be approved by CPUC staff prior to the start of construction. If any cultural resources are discovered, the archaeological monitor has the authority to stop ground-disturbing activities in the immediate area of the discovery. The process outlined in the CRMTP required under MM CR-1b shall then be followed. One Native American monitor from each tribe that has requested involvement (the Pechanga Tribe and the Soboba Band) shall be retained, at the Tribes' option, to observe ground-disturbing activities and all work at P33-00714, subject to the conditions outlined in this mitigation measure. SCE shall consult with Native American tribes that have requested involvement (including Pechanga and Soboba) to determine where additional Native American monitoring is required.</p>	<p>Verify monitoring of ground disturbing activities</p>	<p>Monitoring = During construction Native American notification = 30 days prior to the start of construction</p>
	<p>SCE shall document consultation efforts that show queries to the NAHC and tribes on the NAHC contact list regarding culturally sensitive sites and shall provide this documentation to the CPUC for review and approval prior to any ground-disturbing activities and prior to work at resource P33-00714. Native American monitoring shall be subject to the following conditions: Tribes requesting presence at construction or excavation activities shall be given 30 days advance notice prior to the start of construction and shall be provided the opportunity to monitor construction activities as requested in consultation with SCE subject to the terms of this mitigation measure. SCE shall make a good-faith best effort to schedule construction when a monitor is available. Attendance by Native American monitors during these activities is ultimately at the discretion of the Tribe and the absence of a Native American monitor shall not delay work if the Native American tribe has been given 30 days advance notice. Documentation of consultation activities shall be included in the monitoring plan. The Native American monitors shall have the ability to temporarily halt work or redirect grading from the immediate vicinity of a potential unanticipated archaeological find that may require</p>		

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p>recordation and evaluation. The archaeological monitor shall be notified immediately to determine the procedure to follow per MM CR-1b.</p> <p><b>MM CR-6: Avoid impacts to contributing elements of P33-000714.</b> All activities within the site boundaries of P33-000714 shall be in accordance with SHPO's concurrence letter, sent to SCE on October 7, 2014. Access road construction shall occur only as described in SCE's letter to the SHPO for concurrence. No contributing elements of P33-000714 shall be impacted during construction, operation, and maintenance activities. An ESA shall be established around contributing elements during construction to prevent access by construction crews. Archaeological monitoring shall occur for construction activities within the boundaries of P33-000714. Archaeological monitoring shall be required for maintenance activities within the boundaries of P33-000714 unless the activities involve only driving on established access roads. The archaeological monitor shall have the authority to stop work in the case of an unanticipated resource. In the case of an unanticipated resource, the process outlined in MM CR-1b shall be implemented. In addition, eucalyptus trees shall not be uprooted at site P-33- 000714 but shall be removed by a method that minimizes ground disturbance, such as cutting down the tree and grinding the stump to ground level with a stump grinder as appropriate.</p>	<p>Verify avoidance of cultural resource</p>	<p>During construction</p>
<p><b>Impact CR-2:</b> Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.</p>	<p><b>MM CR-4: Monitor Paleontologically Sensitive Areas.</b> SCE shall retain a qualified paleontologist to monitor ground-disturbing activities in paleontologically sensitive areas as defined in the Paleontological Resource Monitoring Plan (PRMP). The qualified paleontologist shall be approved in advance by the CPUC. The qualified paleontologist shall prepare a brief Paleontological Resource Monitoring Plan that includes methods of paleontological monitoring and includes construction maps delineating areas of ground disturbance that shall be monitored for paleontological resources. These shall include areas where: There is a high or undetermined paleontological sensitivity. There is a potential for fossils to occur at a level shallow enough to be adversely affected by project activities. Areas where fossils would likely occur include but are not limited to the Silverado Formation. Areas where fossils are not reasonably likely to be discovered include areas of igneous substrate, such as the Estelle Mountain volcanic rock.</p>	<p>Verify monitoring of ground disturbing activities</p>	<p>During construction</p>

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p>Qualifications for proposed paleontological monitors shall be submitted to the CPUC for review and approval. Only CPUC-approved paleontological monitors shall serve on this project. The paleontological monitor shall have the authority to halt construction in the vicinity of any potential finds in order to begin implementation of MM CR-5. A reduction in monitoring activities will be determined based on field observations and in coordination with SCE and CPUC.</p> <p><b>MM CR-5: Follow Paleontological Resource Discovery Protocol.</b> In the case that a previously unknown paleontological resource is discovered during construction activities, all work within 15 meters of the resource shall be stopped, and the CPUC-approved paleontologist shall determine whether the resource can be avoided. If the resource cannot be avoided, the paleontologist shall determine whether the resource is unique under Part V of CEQA Guidelines Appendix G. A paleontological resource shall be considered unique if it meets the definition of a significant paleontological resource under the 2010 Society of Vertebrate Paleontology <i>Standard Procedures for the Assessment of Adverse Impacts to Paleontological Resources</i> definition: Significant paleontological resources are fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information. Paleontological resources are considered to be older than recorded human history and/or older than middle Holocene (i.e., older than about 5,000 radiocarbon years) (Society of Vertebrate Paleontology 2010). Substantiation of the uniqueness conclusion shall be provided to the CPUC for review and approval. Work shall be allowed to continue if the resource is not unique. If the resource is unique, then work shall remain stopped until the approved paleontologist has consulted with SCE and the CPUC and a feasible approach, approved by the CPUC, has been developed that will prevent destruction of the resource by site protection or recovery. Methods of recovery, testing, and evaluation shall adhere to current professional standards for recovery, preparation, identification, analysis, and curation, such as</p>	<p>Verify implementation of resource discovery protocol</p>	<p>During construction</p>

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	the 2010 Society of Vertebrate Paleontology <i>Standard Procedures for the Assessment of Adverse Impacts to Paleontological Resources</i> . Work can commence following recovery and CPUC approval.		
<b>Impact CR-3:</b> Disturb any human remains, including those interred outside of formal cemeteries.	<b>MM-CR-7: Follow Necessary Procedures for Unanticipated Discovery of Human Remains.</b> The CRMTP (MM CR-1b) shall include a summary of the applicable laws concerning human remains, including: CEQA Guidelines section 15064.5(e); PRC sections 5097.94, 5097.98, and 5097.99; and California Health and Safety Code section 7050.5. These laws require Native American consultation for Native American burial sites. The CPUC shall be notified immediately after the legally mandated notification of the county medical examiner if any human remains are encountered during construction. Workers shall be trained in procedures to follow in case of unanticipated discovery of human remains as part of the Worker Environmental Awareness Plan.	Verify implementation of Resource discovery protocol	During Construction
<b>Geology, Soils, and Mineral Resources</b>			
<b>Impact GE-1:</b> Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42); strong seismic ground shaking; seismic-related ground failure including liquefaction; or landslides.	<b>Project Commitment B: Worker Environmental Awareness Plan. Project Commitment D: Habitat Restoration and Revegetation Plan. Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.</b>	Verify completion of study and implementation of recommendations	Prior to and during construction
<b>Impact GE-2:</b> Result in substantial soil erosion or the loss of topsoil.	<b>Project Commitment D: Habitat Restoration and Revegetation Plan. MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).</b>	See above	See above
	<b>Project Commitment E: Grading Plan.</b>	Verify preparation and implementation	Prior to and during

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
		of grading plan	construction
<p><b>Impact GE-3:</b> Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse.</p>	<p><b>Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.</b></p>	See above	See above
<p><b>Impact GE-4:</b> Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.</p>	<p><b>Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.</b></p>	See above	See above
<p><b>Impact GE-5:</b> Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water.</p>		See above	See above
<b>Greenhouse Gases</b>			
No measures apply.			
<b>Hazards and Hazardous Materials</b>			
<p><b>Impact HZ-1:</b> Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.</p>	<p><b>Project Commitment B: Worker Environmental Awareness Plan. Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards. MM BR-15: Stormwater Pollution Prevention Plan (SWPPP). MM WQ-1: Blasting Plan and Best Management Practices.</b></p>	See above	See above
		Verify preparation and implementation of hazard materials management plan	Prior to and during construction
	<p><b>MM HZ-2: Contaminated Soil/Groundwater Contingency Plan.</b> Prior to the start of construction, to the extent not otherwise included within plans required by the Riverside County Hazardous Materials Management Division, SCE shall develop a Contaminated Soil/Groundwater Contingency Plan to address the unearthing or exposure of buried hazardous materials or contamination or</p>	Verify preparation and implementation of contaminated soil/groundwater contingency plan	Prior to and during construction

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p>contaminated groundwater during construction of the projects. The Plan shall detail steps that SCE or its contractor will take to prevent the spread of contamination, the sampling necessary if contamination is discovered, and remedial action to be taken. The Plan, at minimum, shall include the following: Contact information for federal, regional, and local agencies, SCE's environmental coordinator(s) responsible for the cleanup of contaminated soil or groundwater, and licensed disposal facilities and haulers. Procedures to minimize environmental impacts in the event that hazardous soils, contaminated groundwater, or other hazardous 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. Training requirements for construction workers performing excavation activities including training on types of contamination including common contaminants (e.g., petroleum hydrocarbons, lead, mercury, and metals, asbestos, acetone, nitrate, semi-volatile organic compounds and volatile organic compounds (benzene), polychlorinated biphenyls, sanitary waste, and pesticides) and <i>hazardous materials</i> (as defined by the California Health and Safety Code) and identifying potentially hazardous contamination (e.g., stained or discolored soil and odor).</p> <p>4. Dewatering procedures including storage, testing, treatment, and disposal requirements and dewatering BMPs set forth in SCE's Storm Water Pollution Prevention Plan. SCE shall submit the plan to CPUC for review and approval at least 60 days prior to the start of construction. SCE shall implement the plan during construction of the projects.</p>		
<p><b>Impact HZ-2:</b> Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.</p>	<p><b>MM HZ-3: Contacting Affected Landowners Regarding Underground Facilities.</b> Prior to construction SCE shall contact affected private landowners to determine if septic systems and associated leach fields as well as other underground facilities may be impacted by construction of the projects. Final engineering plans for the projects shall be designed to avoid damage to underground facilities, both public and private. SCE shall immediately notify by</p>	<p>Verify utilization of digalert</p>	<p>During construction</p>

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	telephone the owner of underground facilities that may have been damaged or dislocated during construction of the projects.		
<p><b>Impact HZ-3:</b> Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school.</p>	<p><b>Project Commitment B: Worker Environmental Awareness Plan. Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards. MM BR-15: Stormwater Pollution Prevention Plan (SWPPP). MM HZ-2: Contaminated Soil/Groundwater Contingency Plan. MM WQ-1: Blasting Plan and Best Management Practices.</b></p>	See above	See above
<p><b>Impact HZ-4:</b> Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.</p>	<p><b>MM HZ-2: Contaminated Soil/Groundwater Contingency Plan.</b></p>	See above	See above
<p><b>Impact HZ-8:</b> Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.</p>	<p><b>MM HZ-4: Fire Control and Emergency Response.</b> SCE, in consultation with its contractors, shall develop and implement site-specific fire control and emergency response plans to address the risk of fire or other emergencies (e.g., flooding) during construction, operation, and maintenance of the projects. The plans and a record of contact and coordination with the fire departments with jurisdiction over each worksite shall be submitted to the CPUC for review and approval prior to start of construction. The plans shall describe fire prevention and response practices that SCE and its contractors will implement to minimize the risk of fire, and in the event of fire or other emergencies, provide for immediate response. The site-specific plans shall specify that SCE or its contractors will furnish supervision, labor, tools, equipment, and materials for the prevention of fire and extinguishing and controlling the spread of fires started as a result of project activities. During Construction: SCE or its designee shall designate a full time Fire Risk Manager who will be present during construction activities, whose sole responsibility will be to monitor the contractor's fire-prevention activities, and who will have full authority to stop construction as needed to prevent fire hazards. The Fire Risk Managers shall: Serve as liaisons to fire departments and act as a point of contact for fire departments in the event of fire or other emergency; Manage the prevention, detection,</p>	Verify preparation and implementation of fire control and emergency response plan	Prior to and during construction

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p>control, and extinguishing of fires set accidentally as a result of construction activity; Review site-specific fire control and emergency response plans prior to starting work; Ensure that all construction personnel are trained in firesafety measures relevant to their responsibilities. At minimum, construction personnel shall be trained in fire and emergency reporting and incipient-stage fire prevention, control, and extinguishing (i.e., the fire can be controlled or extinguished by portable fire extinguishers, small hose systems, or portable water supplies without the need for protective clothing or breathing apparatus). Each member of the construction workforce shall be trained and equipped to extinguish small fires; Be equipped with radio and cellular telephone access for the duration of each work day; Ensure that all construction personnel are provided with operational radio and cellular telephone access at each worksite to allow for immediate reporting of fires or other emergencies and ensure that communication pathways and equipment are tested and confirmed operational each day prior to initiating construction activities at each worksite; and Maintain an updated key personnel and emergency services contact (telephone and email) list onsite and available to construction personnel. Construction workers shall immediately report all fires to the nearest Fire Risk Manager. During All Project Phases: Equipment installed and maintained as part of the project shall include: Spark arresters that are in good working order and meet applicable regulatory standards for all internal combustion engines (both stationary and mobile); Fire suppression equipment on all motorized vehicles that includes, at minimum, one shovel and one pressurized chemical fire extinguisher; A fire extinguisher capable of extinguishing any equipment- caused fire on all heavy construction equipment; and Portable communication devices (e.g., radios or cellular telephones) and communication protocols for project workers to coordinate with local agencies and emergency personnel in the event of fire or other emergencies. Measures to be undertaken by SCE or its contractors shall include: Prohibiting smoking during the operation of light or heavy construction equipment; in wildland areas; and within 30 feet of any area where combustible materials (e.g., fuels, gases, and solvents) are stored; Limiting smoking to paved areas or areas cleared of all vegetation; Posting no-smoking signs and fire</p>		

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p>rules on project bulletin boards, at contractor field offices, and in other areas visible to workers during fire season; Maintaining all worksites in an orderly, safe, and clean manner. Maintaining staging areas and parking areas free of extraneous flammable materials. Removing all oily rags and used oil filters from worksites; Confining hot-work activities (e.g., welding, brazing, soldering, grinding, and arc cutting) to cleared areas with a minimum 10-foot clearance radius measured from place of hot-work activity; Ensuring an appropriate fire extinguisher is present before initiating each hot-work activity; Preventing vehicles with hot exhaust manifolds from idling on roads with combustible vegetation under the vehicles; Ensuring all Blasting Plan (MM WQ-1) BMPs are followed, e.g., pre-blast and post-blast inspections; Notifying the fire department with jurisdiction over the worksite in advance of all planned burning activities (e.g., to clear vegetation). Special care shall be taken to prevent damage to adjacent structures, trees, and vegetation during planned burning activities; and Any additional fire prevention and detection measures to lower the risk of wildland fires. Measures to be undertaken by SCE or its contractors for days when the National Weather Service issues a Red Flag Warning for a project area shall include: Abiding by all restrictions and requirements that may be imposed by fire departments during Red Flag Warning periods (e.g., parking restrictions; road closures; and work activity and equipment use restrictions and requirements); and Prohibiting smoking at all worksites.</p>		
<b>Hydrology and Water Quality</b>			
<p><b>Impact WQ-1:</b> Violate any water quality standards or waste discharge requirements.</p>	<p><b>Project Commitment B: Worker Environmental Awareness Plan. Project Commitment D: Habitat Restoration and Revegetation Plan Project Commitment E: Grading Plan. Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards. MM BR-15: Stormwater Pollution Prevention Plan (SWPPP). MM BR-7: Habitat Restoration and Revegetation Plan Requirements. MM WQ-1: Blasting Plan and Best Management Practices.</b> SCE or its contractors shall prepare and implement a detailed Blasting Plan for the Valley-Ivyglen Project. This plan shall identify the scope of blasting, all blasting locations, the proximity of facilities to each blasting location, and the types and estimated amounts of blasting agent required for each blasting location. The plan shall be submitted to and approved by</p>	<p>See above Verify preparation and implementation of blasting plan</p>	<p>See above Prior to and during construction</p>

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p>the CPUC prior to start of blasting and the plan shall be resubmitted for approval if changes are required. The intent of the plan is to: Reduce the potential for increased turbidity in groundwater and surface water; Prevent debris from entering drainages, waters of the state, and waters of the United States; and Avoid mishandling of hazardous materials associated with blasting. BMPs shall include, but are not limited to: Conduct pre-blast surveys and inspections and conduct post-blast surveys and inspections for blast performance and fire hazards (e.g., undetonated explosive agent or smoldering materials); Remove and manage muck piles (blast debris) to prevent water contamination; Place matting or padding to contain flyrock and add an appropriate blasting agent to reduce flyrock near sensitive biological and cultural resources; Select an explosive with appropriate water resistance for the blast site to reduce impacts on groundwater; Clean loading equipment in an area where waste can be contained and kept away from drainages and other surface water; Manage muck piles to avoid contact with stormwater and remove them from the project area as soon as reasonably feasible; and Handle hazardous materials located during blasting in accordance with MM HZ-2.</p>		
	<p><b>MM WQ-2: Drainage crossing procedures and practices.</b> Within two weeks following a significant precipitation event (e.g., &gt;0.6 inches within a 24-hour period) and prior to construction-related drainage crossing, a qualified aquatic monitor shall inspect any drainages that must be crossed. The inspector shall determine whether the drainage may be crossed without a bridge, crossed with a bridge, or avoided until conditions become more suitable for crossing. If a temporary or permanent bridge is required in order to avoid impacts, the following measures shall be implemented: Any temporary or permanent bridges shall be installed to avoid placement below the Ordinary Highwater Mark of the drainage as feasible. Prior to construction, SCE shall obtain all necessary permits and approvals from the USACE, Santa Ana RWQCB, and CDFW.</p>	<p>Verify implementation drainage crossing procedures</p>	<p>During construction</p>
	<p><b>MM WQ-3: Design of access roads with erosion control measures.</b> Access roads shall be designed and built to minimize adverse erosion and siltation impacts. Measures to be incorporated into unpaved roadway design and construction shall include, but are not limited to:</p>	<p>Verify erosion minimization measures</p>	<p>Prior to and during construction</p>

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	Design road with insloping, outsloping, or crowning; Incorporate rolling dips; Incorporate water bars; Avoid overgrading; and Build ditches.		
	<b>MM WQ-4: Disposal of groundwater from dewatering excavations.</b> Groundwater extracted as a result of dewatering during construction shall not be discharged to waters of the state without written authorization from the Santa Ana RWQCB. Extracted groundwater shall be disposed of on-site in one of the following manners: Discharged to an upland area where it will not enter waters of the state but would instead evaporate or infiltrate; Used for dust control; Used for irrigation water; Used for other construction needs; or Disposed of at a licensed facility if water is suspected of being contaminated or degraded.	Verify disposal of dewatered groundwater	During construction
<b>Impact WQ-3:</b> Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.	<b>Project Commitment D: Habitat Restoration and Revegetation Plan</b> <b>Project Commitment E: Grading Plan. The Riverside County Flood Control and Water Conservation District shall be consulted regarding grading plans for construction and operation of the proposed projects. MM BR-7: Habitat Restoration and Revegetation Plan Requirements. MM WQ-2: Drainage crossing procedures and practices. MM WQ-3: Design of access roads with erosion control measures.</b>	See above	See above
		Verify design adequacy of detention basin	Prior to construction
<b>Impact WQ-4:</b> Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.	<b>MM BR-7: Habitat Restoration and Revegetation Plan Requirements. MM WQ-3: Design of access roads with erosion control measures.</b>	See above	See above
	<b>MM WQ-5: Maintain capacity and connectivity of drainages.</b> SCE shall design and construct access roads to maintain the capacity and connection of drainages that are adjacent to and crossed by access roads for the proposed projects. Methods to maintain drainage characteristics include installation of culverts or designing low water crossings. Prior to any alteration of a drainage, including grading or the placement of fill material or culverts in a drainage, SCE shall obtain any permits required by the USACE, Santa Ana RWQCB, and CDFW.	Verify implementation of drainage protection measures	During construction

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<b>MM WQ-6: Avoid impeding MDP implementation and function.</b> Prior to construction, SCE shall consult with the RCFCWCD for project elements located within MDP areas. Construction within MDP areas shall not be allowed to proceed until SCE consults with the RCFCWCD about whether project elements located in these areas would not impede the function of flood control facilities and would not prevent implementation of the MDP.	Verify avoidance of MDP areas	During construction
<b>Impact WQ-5:</b> Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.		See above	See above
<b>Impact WQ-7:</b> Place within a 100-year flood hazard area structures which would impede or redirect flood flows.	<b>MM WQ-5: Maintain capacity and connectivity of drainages.</b>	See above	See above
<b>Impact WQ-8:</b> Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.	<b>MM HZ-4: Fire Control and Emergency Response.</b>	See above	See above
<b>Impact WQ-9:</b> Expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow	<b>Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.</b>	See above	See above
<b>Land Use and Planning</b>			
<b>Impact LU-2:</b> Conflict with any applicable habitat conservation plan or natural community conservation plan.	<b>MM BR-6: Oak tree protection measures. MM BR-7: Habitat Restoration and Revegetation Plan Requirements. MM BR-8: Special Status Plant Avoidance and Mitigation Measures. MM BR-11: Migratory Birds and Raptors Impact Reduction Measures. MM BR-12: Burrowing Owl Impact Reduction Measures.</b>	See above	See above
<b>Noise</b>			
<b>Impact NV-1:</b> Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies	<b>Project Commitment H: Noise Control.</b>	Verify implementation	During construction
	<b>MM NV-1 Construction Noise Reduction Measures.</b> Prior the start of construction, SCE shall prepare and submit to the CPUC a Noise Control Plan, which shall detail the frequency, location, and methodology for noise monitoring prior to and during the proposed	Verify preparation and implementation of noise monitoring plan	Prior to and during construction

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p>construction activities, such as for activities within the Cities of Lake Elsinore and Perris. The Noise Control Plan will shall also detail the actions and procedures that SCE will implement to avoid significant impacts from temporary ambient noise increases. Measures in the Noise Control Plan shall include, but not be limited to the following: Reducing the number of pieces of equipment concurrently operating near sensitive receptors, as feasible. Where feasible and available, using construction equipment specifically designed for low noise emissions (i.e., equipment that is powered by electric or natural gas engines instead of diesel or gasoline reciprocating engines). Electric engines have been reported to have lower noise levels than internal combustion engines.</p> <p>Compensating residents for temporary relocation during high-noise activities that cannot be reduced to less than 90 dBA. SCE shall monitor construction and maintenancenoise levels in hourly equivalent averages Leq(h) before and during construction activities planned within 20 feet of noise sensitive receptors. During the project construction period, noise measurements shall be taken on a daily basis and reported to the CPUC on a monthly basis, within 15 days of the end of the monitoring period. Where applicable, the hours of construction may be altered from Project Commitment H to include a 12-hour day in accordancewith a local jurisdiction. Within the City of Wildomar, for instance, construction may occur between the hours of 6:00 a.m. and 6:00 p.m. instead of 7:00 a.m. and 7:00 p.m. SCE shall submit the Noise Control Plan to the CPUC for review and approval at least 30 days prior to the start of project construction. SCE shall comply with all requirements of the approved Noise Control Plan whenever it applies during construction and maintenance activities for the projects.</p>		
<b>Impact NV-2:</b> Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.	<b>Project Commitment H: Noise Control.</b>	See above	See above
	<b>MM VIG NV-2: Blasting Vibration Control Measures.</b> During final project design, if blasting is proposed, SCE shall develop a blasting mitigation and monitoring plan to be implemented during blasting activities for the Valley-Ivyglen project. The plan shall be submitted to the CPUC for review and approval at least 30 days prior to the start of project construction. During plan development, applicant must assess	Verify preparation and implementation of blasting mitigation and monitoring plan	Prior to and during construction

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p>distances to sensitive receptors and include blasting procedures in the plan that ensure blasting operations will be engineered safely and effectively. The plan shall include the following requirements for blasting activities: Using blasting methods designed to reduce vibration and air overpressure; Using pre-blast warning signals prior to detonating the blast and after detonation, conducting post-blast safety inspections; Conducting blast monitoring for all blasting operations. A daily log shall be maintained by the blasting contractor for each blast detonated on each working day, including monitoring of ground motions, peak particle velocity, and air blast levels; Implementing modifications to blasting procedures -- such as using different delay patterns, reducing the size of individual blasts, using shorter and/or smaller diameter blast holes, closer spacing of blast holes, reducing volume of explosives used, using protective measures (e.g., gravel or blasts mats) -- as necessary to control rock and debris that may be expelled from the blast sites and sound walls or a combination of measures in the case that blasting would result in vibration or blast levels with a PPV in excess of 2.0 inches/second or 80 VdB as measured at the closest residential receptors property line; Limiting hours of blasting to daytime hours between 7:00 a.m. and 7:00 p.m., Monday through Saturday; Implementing a public outreach program to provide alerts the affected public to the potential for vibrations and noise associated with blasting not less than three and not more than ten days prior to the commencement of blast activities; and responding to and investigating complaints.</p>		
<p><b>Impact NV-4:</b> Substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project</p>	<p><b>Project Commitment H: Noise Control. MM NV-1 Construction and Maintenance Noise Reduction Measures. MM NV-2 Blasting Vibration Control Measures.</b></p>	<p>See above</p>	<p>See above</p>
<p><b>Population and Housing</b></p>			
<p>No measures apply.</p>			
<p><b>Public Services and Utilities</b></p>			
<p><b>Impact PS-1:</b> Result in substantial adverse physical impacts on governmental facilities or from the need for new or physically altered governmental facilities, the</p>	<p><b>MM HZ-4: Fire Control and Emergency Response.</b></p>	<p>See above</p>	<p>See above</p>

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following: (1) fire protection, (2) police protection, (3) schools, (4) parks, or (5) other public facilities.			
<b>Impact PS-3:</b> Require or result in the construction of new storm water drainage facilities or expansion of existing facilities.	<b>Project Commitment E: Grading Plan. The Riverside County Flood Control and Water Conservation District shall be consulted regarding grading plans for construction and operation of the proposed projects. Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards. MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas.</b>	See above	See above
<b>Recreation</b>			
No measures apply.			
<b>Transportation and Traffic</b>			
<b>Impact TT-1:</b> Conflict with an applicable plan, ordinance or policy establishing a measure 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.	<b>Project Commitment H: Noise Control</b> <b>MM TT-1: Traffic Management and Control Plan.</b> As part of the encroachment permit, SCE shall prepare a Traffic Management and Control Plan that may include measures to ensure that: Traffic flow, bicycle access, and pedestrian access is not completely restricted on any roadway for longer than 15minutes, or a detour is provided; Emergency access is maintained at all times; and Lane closures do not create safety hazards. In addition to measures required by agencies with jurisdictions over the project, this plan also may provide for the following: Include a discussion of work hours, haul routes, work area delineation, traffic control, and flagging; Identify all access and parking restriction and signage requirements; Require workers to park personal vehicles at the approved staging area and take only necessary project vehicles to the work sites; Lay out plans for pre-construction notifications to and a process for communication with affected residents and landowners. Advance public notification shall include posting of notices and appropriate signage regarding 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	See above Verify the preparation and implementation of Traffic Management and Control Plan	See above Prior to and during construction

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p>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; Require posting of warning signs so that motorists are prepared for slow trucks; Require notification of emergency service providers regarding the timing, location, and duration of construction activities. Require all roads to remain passable to emergency service vehicles at all times; Identify all roadway locations where special construction techniques (e.g., night construction) would be used to minimize impacts to traffic flow; Require emergency vehicle access to be maintained at all times; Encourage full use of the full roadway width that existed prior to construction during non-working hours, if possible; Restrict deliveries of large equipment during peak traffic hours to the extent feasible in accordance with applicable local ordinances; Ensure that traffic control is performed in accordance with final engineering plans and approved drawings attached to any permit issued; When required, such as during egress of slow traffic on public roadways, traffic shall be controlled by flaggers who shall be in constant communication with each other during flagging operations; Require removal of all dirt from the roadway each day before the completion of work; and Require streets to be maintained in drivable condition at all times. The Traffic Management and Control Plan shall be submitted to the CPUC for review and approval prior to submittal of the permit application to Caltrans. The plan will account for Caltrans standards and guidelines.</p>		
<p><b>Impact TT-2:</b> Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways</p>	<p><b>MM TT-2: Heavy Vehicle Traffic Restrictions.</b> SCE shall minimize heavy vehicle traffic for the project at the Lake Street and I-15 northbound ramp during the AM peak hour (7:00 AM to 9:00 AM) for the duration of project construction. Heavy vehicles traveling to project sites during the AM peak hour shall be diverted to the Indian Truck Trail and I-15 northbound ramp. Prior to the start of construction, SCE shall alert truck drivers associated with the project. SCE shall also minimize construction traffic for the project at the Menifee Road and SR-74 intersection during the PM peak hour (4:00 PM to 6:00 PM). SCE may require construction traffic to exit Staging Area ASP7 and Staging Area VIG2 prior to 4:00 PM or after 6:00 PM. Alternatively, SCE may provide an alternative access route.</p>	<p>Verify the restriction of heavy vehicles</p>	<p>During construction</p>

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	<p><b>MM TT-3: Highway Closure Plan.</b> SCE shall prepare and submit to Caltrans a Highway Closure Plan as part of its Caltrans encroachment permit application. The plan shall ensure that closure or partial closure of I-15 and SR-74 are planned so as to minimize traffic disruption and other hazards to highway users. The plan may include measures to limit construction to off- peak, non-daytime hours, from 10 p.m. to 5 a.m., and to include signage posted prior to the closure to alert drivers of the closure in accordance with Caltrans requirements. The plan will be reviewed and approved by Caltrans to minimize delay to I-15 and SR-74 traffic. If needed, the plan shall also outline suggested detours for I-15 and SR-74 traffic, including routes and signage. At least 15 days prior to initiating installation of the crossings, SCE shall provide to the CPUC evidence of Caltrans granting the encroachment permit.</p>	<p>Verify preparation and implementation of highway closure plan</p>	<p>Prior to and during construction</p>
<p><b>Impact TT-3:</b> 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</p>	<p><b>Project Commitment G: Aircraft Flight Path Safety Provisions and Consultations.</b></p> <p><b>MM TT-4: Helicopter Lift Plan.</b> SCE's helicopter contractor shall coordinate with the FAA and obtain FAA-required approvals for helicopter operations. SCE contractor's submittal to the FAA shall include a Helicopter Lift Plan for operations within 500 feet of a congested area or within 500 feet of residences in compliance with 14 CFR 133.33, which requires that flights be conducted so emergency landings and release of external load can be accomplished without safety risks to people or property when operating over congested areas. The Helicopter Lift Plan shall include the following measures, to the extent feasible:</p>	<p>Verify consultation with FAA</p>	<p>Prior to construction</p>
	<p>Designation of a responsible party for equipment inspections; Communication procedures; Identification of exclusion zones where pedestrians will not be allowed; and Training of personnel in safety requirements and procedures. The Helicopter Lift Plan and evidence of FAA approval of the plan shall be provided to the CPUC prior to commencing helicopter operations.</p> <p><b>MM TT-5. FAA No-Hazard Determination.</b> SCE shall obtain a determination of no hazard from the FAA when notification under 14 CFR 77 is required for: Use of construction equipment, such as cranes; or Installation of structures, such as lattice steel towers. SCE shall provide documentation of the FAA finding to the CPUC prior to the use</p>	<p>Verify determinations from FAA</p>	<p>Prior to construction</p>

**Table 5-2 Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen Project**

Impact	Valley-Ivyglen Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	of equipment or installation of structures that require notification under 14 CFR 77.		
<b>Impact TT-4:</b> Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	<b>MM TT-1: Traffic Management and Control Plan.</b>	See above	See above
	<b>MM TT-6: Road Damage Repair.</b> SCE shall restore and repair to pre-project conditions any private roads damaged by project vehicle traffic. SCE shall document roadway conditions with photographs prior to the project along roads identified for heavy vehicle use in the project's Traffic Impact Analysis. SCE shall also take photographs after the project and after completion of any repairs to document restoration of pre-project pavement conditions	Verify the documentation and restoration of damaged roads	Prior to and post construction
<b>Impact TT-5:</b> Result in inadequate emergency access	<b>MM TT-7: Emergency Service Provider Notification.</b> SCE shall notify local emergency service providers (i.e., police departments, ambulance services, and fire departments) of road closures at least one week prior to the closure. SCE shall notify the provider of the location, date, time, and duration of closure. SCE shall also coordinate with local emergency service providers to ensure emergency vehicle access at all times during construction by, for example, keeping metal plates available to cover open trenches.	Verify notification of emergency service providers	Prior to and during construction
<b>Impact TT-6:</b> Conflict with adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities	<b>MM TT-1: Traffic Management and Control Plan</b>	See above	See above

**Attachment A – Project Contact List**



## Valley - Ivyglen Project Contacts

Name	Position	Email	Phone (Work)	Phone (Mobile)
<b>First/Emergency Contacts</b>				
<b>SCE &amp; Consultants:</b>				
Mike Bass	SCE Project Manager	<a href="mailto:Michael.Bass@sce.com">Michael.Bass@sce.com</a>		(909) 524-9811
Marcus Obregon	SCE Environmental Project Manager	<a href="mailto:Marcus.Obregon@sce.com">Marcus.Obregon@sce.com</a>		(626) 320-0957
Hannah Collette	Construction Contractor Environmental Manager	<a href="mailto:hcollette@wilsonconst.com">hcollette@wilsonconst.com</a>		(913) 708-3350
Coltin Scott	Construction Contractor Environmental Field Lead	<a href="mailto:cbscott@wilsonconst.com">cbscott@wilsonconst.com</a>		(503) 572-8372
<b>CPUC/ E &amp; E/ Ecotech:</b>				
Patricia Kelly	CPUC Environmental Division Project Manager	<a href="mailto:Patricia.kelly@cpuc.ca.gov">Patricia.kelly@cpuc.ca.gov</a>	(916) 210-1825	
Chuck Cleeves, E & E	CPUC Compliance Manager	<a href="mailto:ccleeves@ene.com">ccleeves@ene.com</a>		(619) 892-2481
Fernando Guzman, E & E	CPUC Deputy Compliance Manager	<a href="mailto:fguzman@ene.com">fguzman@ene.com</a>	(415) 398-5326 ext. 4704	(415) 894-7567
<b>Secondary Contacts</b>				
<b>SCE</b>				
Thomas Diaz	SCE Regulatory Case Manager	<a href="mailto:Thomas.Diaz@sce.com">Thomas.Diaz@sce.com</a>	(626) 302-1164	(909) 267-0891
<b>CPUC/ E &amp; E/ Ecotech:</b>				
Vince Semonsen	E & E (Ecotech Resources) Compliance Monitor	<a href="mailto:vsemonsens@earthlink.net">vsemonsens@earthlink.net</a>		(805) 452-8085
Fernando Guzman	E & E Compliance Monitor	<a href="mailto:fguzman@ene.com">fguzman@ene.com</a>	(415) 398-5326 ext. 4704	(415) 894-7567
<b>Other Contacts:</b>				

## **Attachment B: Site Inspection Form**



## Valley – Ivyglen Subtransmission Project CPUC Site Inspection Form

Project:	Valley – Ivyglen Project	Date:	
Project Proponent:	SCE	Report #:	
Lead Agency:	California Public Utilities Commission	Monitor(s):	
CPUC PM:	Patricia Kelly, Energy Division	AM/PM Weather:	
CPUC CM (E & E):	Chuck Cleeves	Start/End time:	
Project NTP(s):			

### SITE INSPECTION CHECKLIST

WEATP Training	Yes	No	N/A
Has WEAP 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 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?			
<b>Biology</b>			
Have preconstruction surveys been completed for biological (coastal California gnatcatcher, least Bell's vireo, southwestern will flycatcher, rare plants) 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)?			
Were any threatened or endangered species observed? If yes, list observations below:			
Are there wetlands or water bodies present near construction activities?			
Have there been any work stoppages for biological resources?			
<b>Cultural and Paleontological Resources</b>			
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?			
<b>Hazardous Materials</b>			
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?			
<b>Work Hours and Noise</b>			
Are night lighting reduction measures in place, as needed?			
Is construction occurring within approved hours?			
Are noise control measures in place within 100 feet of sensitive receptors as needed?			

<p>AREAS MONITORED (i.e., structure numbers, yards, or substations)</p>
<p>DESCRIPTION OF OBSERVED ACTIVITIES (i.e., mitigation measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews)</p>
<p>MITIGATION MEASURES VERIFIED (Refer to MMCRP Report only on MMs pertinent to your observations today)</p>
<p>RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)</p>
<p>COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on-site, environmental observations of note)</p>
<p><b>COMPLIANCE SUMMARY</b>  Check all applicable boxes below to indicate new conditions or issues that have occurred since your last visit. Note this information on the monitoring datasheet and document with photographs.</p> <p><input type="checkbox"/> New biological or cultural discovery requiring compliance with mitigation measures, permit conditions, etc.</p> <p><input type="checkbox"/> Potential compliance incident(s) observed. Document incident(s) and potential for environmental resources to be impacted.</p>

New non-compliance issues reported by SCE monitors since your last visit. Describe issues and resolution under “compliance suggestions or additional observations” (above) and include SCE report identification number.

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

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description

Completed by:	
Firm:	
Date:	

Reviewed by:	
Firm:	
Date:	

**Attachment C – Non-Compliance Form**



## Valley – Ivyglen Subtransmission Project Construction Non-Compliance Report

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

Description of Incident:

Pertinent Plans/Permits/Mitigation Measures:

Proposed Resolution:

Recommended timeline for follow-up:

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

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

<b>Non-compliance Level</b>	<b>Example</b>
<p>A Level 1 non-compliance incident is an action that deviates from project requirements or results in the partial implementation of the mitigation measures but has not caused, nor has the potential to cause, impacts on environmental resources.</p>	<ul style="list-style-type: none"> <li>i. Failure to implement adequate dust control measures, resulting in no impact on resources</li> <li>ii. 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>iii. Inadvertent minor incursion into exclusion area, resulting in no harm to sensitive biological or cultural resources</li> <li>iv. Work outside the approved work limits where the incident is within a previously disturbed area, such as a gravel lot</li> </ul>
<p>A Level 2 non-compliance incident is an action that deviates from project requirements or mitigation measures and has caused, or has the potential to cause, minor impacts on environmental resources.</p>	<ul style="list-style-type: none"> <li>i. Work without appropriate permit(s) or approval</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. Working outside of approved hours</li> <li>iv. Repeated documentation of Level 1 incidents</li> </ul>
<p>A Level 3 non-compliance incident is an action that deviates from project requirements and has caused, or has the potential to cause, immediate and major impacts on environmental resources. These actions are not in compliance with the PCs, mitigation measures, permit conditions, approval requirements (e.g. minor project changes, notice to proceed), and/or violate local, state, or federal law.</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. Imminent 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 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> </ul>

## **Attachment D – Minor Project Refinement Form**

**Appendix D: Minor Project Refinement Form**



**Valley – Ivyglen Subtransmission Project  
CPUC Minor Project Refinement Form**  
[with instructions]

**Minor project refinements** are strictly limited to changes that will not trigger an additional permit requirement (except local government ministerial permits and associated requirements), do not substantially increase the severity of a previously identified significant impact based on criteria used in the FEIR, create a new significant impact, are located within the geographic boundary of the study area of the FEIR, and that don't conflict with any mitigation measure or applicable law or policy.

**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]

**Anticipated Start Date for Proposed Action:**

**Anticipated End Date for Proposed Action:**

**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 the proposed minor Project refinement, including how project refinement deviates from current project and an explanation for why the refinements are necessary:**

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 SCE 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 vaguer the language, the more conditions may need to be added to account for omissions. Avoid logic leaps.

**Describe the dimensions and area of any additional work areas and land disturbance associated with the proposed refinements. Include/attach photos, maps, or other documentation illustrating the existing conditions in the area:**

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.

**Provide a summary list of applicable Project requirements (e.g., MMs, etc.) for which the refinements are being requested:**

Demonstrate that SCE 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.

**Would the proposed refinements conflict with any of the above-listed MMs or other Project requirements or applicable laws, regulations, or policies?**

**No    Yes**

*Explain proposed refinements consistency/inconsistency with applicable Project requirements below.*

**Would the Proposed Project refinements result in a new impact, or increase the severity of a previously analyzed impact on:**

**No    Yes**

**Aesthetics (e.g. damage scenic resources or vistas, degrade the existing visual character of the site and its surroundings, or create sources of light or glare)?**

**Summary of Proposed Project Refinement Impacts on Aesthetics:**

**Agriculture and Forestry (e.g. convert farmland to non-agricultural use, or forest land to non-forest use, or create a conflict with existing agricultural zoning or a Williamson Act)?**

**Summary of Proposed Project Refinement Impacts on Agriculture and Forestry:**

**Air Quality (e.g. violate any air quality standard, or produce criteria air pollutant emissions, or expose sensitive receptors to addition pollutants)?**

**Summary of Proposed Project Refinement Impacts on Air Quality:**

**Biological Resources (e.g. have an adverse effect on sensitive or special-status species; impact riparian, wetland, or any other sensitive habitat; or interfere with the movement of native resident or migratory fish or wildlife)?**

**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 SCE has an understanding of what resources are currently present in this new area or could be impacted by this new practice.]

**Summary of Proposed Project Refinement Impacts on Biological Resources:**

**Cultural Resources (e.g. cause an adverse change to a significant historical, archeological, paleontological, or tribal resource or disturb any human remains)?**

**Summary of Proposed Project Refinement Impacts on Cultural Resources:**

**Geology, Soils, and Seismicity (e.g. expose people or structures to risk of loss, injury, or death involving seismic-related ground failure including liquefaction or landslides, be located on a geologic unit, unstable soil, or expansive soil)?**

**Summary of Proposed Project Refinement Impacts on Geology, Soils, and Seismicity:**

**Greenhouse Gas Emissions (e.g. generate a substantial amount of greenhouse gas [GHG] emissions, conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions or GHGs)?**

**Summary of Proposed Project Refinement Impacts on Greenhouse Gas Emissions:**

**Hazards and Hazardous Materials (e.g. create hazards to public or environment through transport, use, disposal, or accident conditions of hazardous materials, be located on a site of hazardous materials, or expose people and structures to loss, injury of death involving wildland fires)?**

**Summary of Proposed Project Refinement Impacts on Hazards and Hazardous Materials:**

**Hydrology and Water Quality (e.g. violate water quality standards or discharge waste requirements, alter the existing drainage pattern creating additional sedimentation, runoff water, or polluted runoff, or inundate by seiche, tsunami, or mudflow)?**

**Summary of Proposed Project Refinement Impacts on Hydrology and Water Quality:**

**Land Use and Planning (e.g. physically divide an established community; conflict with a land use plan, policy, or regulation of an agency with jurisdiction over the project, or conflict with a habitat conservation plan)?**

**Summary of Proposed Project Refinement Impacts on Land Use and Planning:**

**Mineral Resources (e.g. result in the loss of known mineral resources of regional and/or state value, or availability of locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan)?**

**Summary of Proposed Project Refinement Impacts on Mineral Resources:**

Noise and Vibration (e.g. expose sensitive receptors to additional noise or vibration, exposure of persons to or generation of excessive noise, ambient noise, ground-borne noise, or vibration)?

Summary of Proposed Project Refinement Impacts on Noise and Vibration:

Population and Housing (e.g. directly or indirectly induce substantial population growth in an area, or displace substantial numbers of people or existing housing)?

Summary of Proposed Project Refinement Impacts on Population and Housing:

Public Services and Utilities (e.g. result in substantial adverse physical impacts on government facilities that provide a public service or cause environmental impacts to service ratios, response times, or other performance objectives to fire protection, sheriff protection, schools, parks, or other public facilities)?

Summary of Proposed Project Refinement Impacts on Public Services and Utilities:

Recreation (e.g. increase the use of, or cause adverse effects on, existing neighborhood, parks, or other recreational facilities)?

Summary of Proposed Project Refinement Impacts on Recreation:

Transportation and Traffic (e.g. increase hazards due to design feature, result in inadequate emergency access, or conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities)?

Summary of Proposed Project Refinement Impacts on Transportation and Traffic:

**Describe any applicable consultation with other governmental agencies conducted for the proposed refinements:**

Demonstrate that SCE has considered whether other agencies, municipalities, utilities, etc. would need to provide concurrence with this MPR. If so, either provide anticipated contact/approval schedule, or provide dates/contact reports/emails with approvals.

Approvals	Date	Name (print)	Signature	
SCE Project Manager				<input type="checkbox"/> Reviewed
SCE Environmental Project Manager				<input type="checkbox"/> Reviewed
CPUC Project Manager				<input type="checkbox"/> Approved <input type="checkbox"/> Approved with conditions (see below) <input type="checkbox"/> Denied

**For CPUC Compliance Manager Use Only**

<input type="checkbox"/> Refinement Approved	<input type="checkbox"/> Refinement Denied	<input type="checkbox"/> Beyond Authority
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**Conditions of Approval or Reason for Denial:**

Prepared by:

Date:

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