

California Public Utilities Commission
Riverside Transmission Reliability Project
Mitigation Monitoring, Compliance and Reporting
Plan

April 2022



California Public Utilities Commission Riverside Transmission Reliability Project Mitigation Monitoring, Compliance, and Reporting Plan

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ACRONYMS AND ABBREVIATIONS

Acronyms and Abbreviations

AQMD Air Quality Management District

BMP best management practice
CCR California Code of Regulations

CDFW California Department of Fish and Wildlife CEQA California Environmental Quality Act

CFR Code of Federal Regulations

CHRIS California Historical Resources Information System
CPCN Certificate of Public Convenience and Necessity

CPUC California Public Utilities Commission

EI Environmental Inspector

EIR Environmental Impact Report

EM Environmental Monitor

EPE Environmental Protection Element FAA Federal Aviation Administration GIS geographic information systems

kV kilovolt

LEM lead environmental monitor

MM mitigation measure

MMCRP Mitigation Monitoring, Compliance, and Reporting Plan

MMRP Mitigation Monitoring and Reporting Program

MPR Minor Project Refinement

NTP Notice to Proceed

PRC Public Resources Code

RCA Western Riverside County Regional Conservation Authority

ROW right-of-way

RPU Riverside Public Utilities Department
RTRP Riverside Transmission Reliability Project
RWQCB Regional Water Quality Control Board

SCE Southern California Edison

SEIR Subsequent EIR

SWPPP Stormwater Pollution and Prevention Plan

TEWS Temporary Extra Work Space

US United States

USACE US Army Corps of Engineers USFWS US Fish and Wildlife Service

1 Introduction

1.1 SCE Application

On April 15, 2015, Southern California Edison (SCE) submitted Application 15-04-013 to the California Public Utilities Commission (CPUC) for a Certificate of Public Convenience and Necessity (CPCN) to construct and operate the Riverside Transmission Reliability Project (RTRP). The application was amended on April 30, 2015, and SCE revised the Proposed Project in September 2016 to relocate a portion of the 230-kilovolt (kV) transmission line alignment and to change the design of a segment of the transmission lines from overhead to underground. The CPUC certified the Subsequent Environmental Impact Report (EIR) (State Clearinghouse No. 2007011113) and approved Alternative 1 of the project on March 12, 2020, in accordance with California Environmental Quality Act (CEQA) Public Resources Code (PRC) §21080. The CPUC's approval of Alternative 1 was conditioned on the City of Jurupa Valley granting SCE a superior easement for the underground transmission line alignment. If a superior easement is not granted to SCE, the revised project would be constructed.

The RTRP includes components that would be owned and operated separately by Riverside Public Utilities (RPU) and SCE. RPU would construct, own, operate, and maintain certain elements of the RTRP, including the new 69-kV Wilderness Substation, 69-kV subtransmission lines, and interconnection and telecommunication facilities. The SCE CPCN application includes the construction, operation, and maintenance of RTRP elements that would be owned and operated by SCE, collectively referred to as the Proposed Project in this Mitigation Monitoring, Compliance, and Reporting Program (MMCRP). The Proposed Project elements include:

- Approximately 8 miles of new double circuit overhead 230-kV transmission line
- Approximately 2 miles of new double circuit underground 230-kV transmission line
- New 230-kV Wildlife Substation
- Modifications of existing overhead distribution lines
- Modifications at existing substations
- Telecommunication facilities between the existing Mira Loma and Vista Substations, and the proposed Wildlife Substation

1.2 Project Background

The City of Riverside, as the original CEQA Lead Agency for the RPU and SCE RTRP project, determined that the RTRP could have significant impacts on the environment and prepared a Draft EIR in 2011 and a Final EIR in 2012. The EIR addressed both the RPU- and SCE-owned elements of the RTRP and considered the "whole of the action" (CEQA Guidelines Section 15378[a]) because the RPU elements and the SCE RTRP elements could not operate independently.

On February 5, 2013, the Riverside City Council certified the EIR (hereinafter referred to as the 2013 RTRP EIR [State Clearing House # 2007011113]) for the RTRP, and approved the portion of the project under their jurisdiction (Wilderness Substation and 69-kV lines).

The City of Jurupa Valley approved residential and commercial developments within SCE's proposed transmission line route before and after the City of Riverside certified the 2013 RTRP EIR. Several of these developments are under construction or have been completed and would conflict with the 2013 RTRP transmission line route. In September 2016, SCE revised the transmission line route to avoid four entitled development projects by relocating approximately 2 miles of the transmission line underground, predominantly within the streets of Jurupa Valley. The project revisions pose potentially new or increased impacts that were not addressed in the 2013 RTRP EIR. Transmission line revisions also included relocating the proposed overhead 230-kV transmission line from the east side of Wineville Avenue to the west side. Design modifications to relocate existing distribution lines in order to maintain utility clearances are also included in SCE's CPCN Application. The Proposed Project elements that have changed since the City of Riverside certification of the 2013 RTRP EIR are collectively referred to as the "Revised Project."

The CPUC prepared a Subsequent EIR (SEIR) focusing on the environmental impacts resulting from the Revised Project which was certified on March 12, 2020. The City of Jurupa Valley formally granted SCE a superior easement for the underground transmission line on January 20th, 2022 The superior easement guarantees SCE protection against the mandatory relocation of underground project facilities and ensures construction of Alternative 1 as defined in the SEIR.

Project detail maps with the locations of project facilities and construction work areas are provided in Appendix A.

1.3 Mitigation Monitoring, Compliance, and Reporting Plan

1.3.1 Authority

SCE is required to implement environmental protection elements (EPEs) and mitigation measures (MMs) specified in the 2013 RTRP EIR and SEIR, as well as to obtain and implement various agency permits applicable to the project, in order to avoid or reduce potentially significant impacts on the environment. As the CEQA lead agency, the CPUC is responsible for

monitoring and enforcing compliance with these requirements, and to adopt a reporting or monitoring program, pursuant to PRC § 21081.6 and Section 15097 of the CEQA Guidelines. Chapter 3 of Volume 1 of the 2013 RTRP EIR and Chapter 9 of the adopted SEIR included a Mitigation Monitoring and Reporting Program (MMRP) that describe a recommended framework for preparing and implementing a Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP) prior to construction of the project. The Riverside City Council adopted the 2013 RTRP EIR MMRP for the Proposed Project on February 5, 2013. The CPUC's decision on March 12, 2020, included adoption of the MMRP from the 2013 RTRP EIR, as well as adoption of the MMRP for Alternative 1.

This MMCRP was prepared pursuant to the adopted MMRPs, and in accordance with PRC § 21081.6 and Section 15097 of the CEQA Guidelines. SCE was consulted during development of the MMCRP and given an opportunity to comment on its contents. SCE's comments have been incorporated into the Final MMCRP. The contents of the MMCRP may be updated if necessary to further clarify expectations, add new procedures, or revise procedures.

1.3.2 Purpose

This 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 EPEs and MMs presented to the decision-making body or a designated staff person, ensures that the Lead Agency is informed of SCE's compliance with EPEs and MMs. The CEQA Guidelines encourage cooperation in mitigation monitoring and reporting between lead and responsible agencies, where possible.

This MMCRP was prepared to be consistent with the framework in Chapter 3 of Volume 1 of the 2013 RTRP EIR and Chapter 9 of the SEIR, PRC § 21081.6, and CEQA Guidelines Section 15097. This 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 this MMCRP is to:

- Ensure effective implementation of the EPEs and MMs adopted by the CPUC
- Facilitate the monitoring, compliance, and reporting activities of the CPUC and its monitors
- Establish lines of communication related to mitigation monitoring
- Provide a method of effectively documenting and reporting compliance with all EPEs and MMs adopted by the CPUC

Therefore, this MMCRP:

 Summarizes EPEs and MMs and their monitoring and reporting requirements, as identified in the 2013 RTRP EIR and the SEIR

- Describes the process by which environmental monitors designated by CPUC will observe construction of the project to ensure full implementation of each EPE and MM
- Describes the process for recording "non-compliance" (i.e., evidence that SCE is not fully implementing each applicable EPE and MM)

This MMCRP 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.

1.3.3 Implementation

Implementation of this MMCRP begins during pre-construction and continues through post-construction. Monitoring will be conducted throughout the duration of project construction (anticipated February 2022 through September 2026). MMCRP implementation will cease when the CPUC concludes there is no further need for monitoring of the project. SCE must perform post-construction monitoring for the project to comply with EPE and MM requirements, as described in the 2013 RTRP EIR and the SEIR. Post-construction monitoring and MMCRP implementation will continue until compliance with post-construction requirements (e.g., revegetation) has been met.

1.3.4 Schedule

The proposed construction schedule for the project and duration of work for key features as proposed by SCE in June 2021, is presented in Table 1.3-1. The actual construction schedule may vary slightly. SCE is responsible for informing the CPUC of any substantial changes to the proposed construction schedule well in advance. SCE shall provide the CPUC with construction schedule updates on a frequent basis during construction (refer to Section 4.1.5).

The MMCRP shall be implemented before, during, and after construction. Implementation of the MMCRP will end when the CPUC Project Manager determines there is no further need for CPUC monitoring of the project. It is anticipated that implementation of the MMCRP would continue through the majority of SCE's post-construction monitoring period.

Table 1.3-1 SCE's Proposed Construction Schedule

Construction Activity	Period Start	Period End	Estimated Duration
Underground Transmission	July 2022	February 2024	20 months
Overhead Transmission	July 2023	March 2025	21 months
Wildlife Substation	October 2024	October 2026	24 months
Total Project Construction	July 2022	October 2026	52 months

Source: (SCE, 2020)

2 Summary of Requirements

2.1 Requirement Sources

The scope of requirements addressed in the MMCRP primarily originate from the EPEs and MMs identified in the 2013 RTRP EIR and the SEIR, as well as the federal, state, and local permits and authorizations described in the 2013 RTRP EIR and the SEIR, that would have a mitigating effect on the project's environmental impacts. In addition to the requirements described in the 2013 RTRP EIR and the SEIR, the MMCRP identifies procedural requirements to verify and document implementation, as well as communication protocols for the SCE and CPUC project teams (refer to Section 4, Procedures).

Table B-1 located in Appendix B lists all EPEs and MMs from the adopted MMRPs. Table B-1 includes the following information:

- Titles and full text of the required EPEs and MMs
- Applicable locations where implementation would occur
- Performance standards, and applicable timing and implementation phase
- MMCRP tracking references

Federal, state, and local agencies have jurisdiction over lands and resources in the project area. Potentially applicable permits are identified Table 2.9-1 in the 2013 RTRP EIR Project Description, and several EPEs and MMs include requirements to obtain permits and/or agency authorizations.

2.2 Requirement Categories and Implementation Phases

The project requirements addressed in the MMCRP can be separated into eight categories, which are applicable during one or more implementation phase (e.g., Before Construction, During Construction, After Construction)¹. Requirement categories for the project are summarized as follows:

Permits and Authorizations. Requirements that involve obtaining a
permit or authorization from the CPUC or another agency, or otherwise
consulting with an agency prior to an activity.

¹ Some requirements are applicable following construction; however, there are no mitigating requirements applicable during the operation and maintenance phase.

- Plans. Requirements that involve preparing project plans specified in the 2013 RTRP EIR and the SEIR or permits, and submitting such plans to CPUC and jurisdictional agencies for review and approval, where specified. At a minimum, all plans must be submitted to CPUC for record keeping, including plan revisions.
- Notifications. Requirements that involve notifying the public, CPUC, or other agencies prior to initiating specific project activities, or if issues or the need for changes beyond the scope of the approved project description arise.
- Worker Training. Requirements that involve training workers on resource avoidance, impact minimization, communication procedures, and other project requirements.
- Surveys. Requirements that involve surveying project areas prior to or during construction to identify potentially sensitive environmental resources.
- **Field Monitoring.** Requirements that involve field monitoring (e.g., inspection or observation) during construction in sensitive areas, or when sensitive resources could be encountered.
- **Avoidance and Minimization.** Requirements that involve specific activities to avoid or minimize impacts on sensitive resources.
- **Reporting.** Requirements that involve documenting and/or reporting construction or compliance activities.

2.2.1 Permits and Authorizations

Table C-1, located in Appendix C, summarizes permits and authorizations that SCE may be required to obtain from the CPUC and other jurisdictional agencies prior to an activity. The actual need for such permits and authorizations would be determined by the jurisdictional agencies. Table C-1 will be used to track the status of permits and authorizations (refer to Section 5.1, Tracking Systems).

Some permits for the project may include their own subset of requirements, including plans, notifications, worker training, field monitoring, impact avoidance and minimization measures, and reporting. Where applicable, permit requirements will be incorporated into the associated requirement tracking tables addressed in this section and located in Appendix C.

2.2.2 Plans

Several of the project EPEs and MMs (refer to Table B-1) require SCE to prepare project-specific plans to guide the implementation of complex mitigation requirements during one or more project phases. Table C-2, located in Appendix C, lists project plans and placeholders for agency submittal and approval dates. Some of the plans would only be required under certain conditions, as specified in the source EPE or MM. Table C-2 will be used to track the status of

plans for the project, and will be updated on an ongoing basis throughout implementation of the MMCRP.

Project plans require varying levels of review from jurisdictional agencies; however, CPUC review and approval is required for all final versions of plans identified in Table C-2. If agency review of a plan is required, SCE must submit each agency's comments to the CPUC so the CPUC may verify that the comments were adequately addressed. If plans are revised following CPUC approval, the revised plans must be recirculated for review and comment to all agencies with applicable oversight responsibilities.

As with permits, some project plans include their own subset of requirements, including notifications, worker training, monitoring, impact avoidance and minimization measures, and reporting. Where applicable, plan requirements will be incorporated into the associated requirement tracking tables addressed in this section and located in Appendix C.

2.2.3 Notifications

SCE is responsible for notifying members of the public, sensitive receptors, and other utilities that may be affected by construction. SCE is also required to notify the CPUC and entities at certain stages of the project, or under specific conditions, to ensure that stakeholders are aware of important project information. Table C-3, located in Appendix C, lists required notifications, entities to notify, and the dates of notification.

Table C-3 will be used to track the status of required notifications for the project and will be updated on an ongoing basis throughout implementation of the MMCRP. Notification requirements will be complete when the tracking table is fulfilled, and SCE provides adequate documentation to the satisfaction of the CPUC.

MMCRP procedures addressed in Section 4 include notification timelines for certain events. These notifications will be tracked separately from the notifications addressed in Table C-3.

2.2.4 Worker Training

Environmental Training Program

Multiple EPEs, MMs, and project plans specify worker training and communication procedures either prior to working on the site or during morning tailboard meetings. SCE is responsible for preparing training materials and implementing a worker environmental awareness program (WEAP) for workers and other project personnel..

All project personnel, including construction workers and compliance monitoring workers, must participate in the WEAP prior to working on the project site. Personnel that have not participated in the WEAP must be escorted by a designated SCE or CPUC representative who has received the full WEAP training.

Levels of Training

Due to variations in the types of workers and duration of time they may spend on-site, up to three levels of training may be provided, each with graduated levels of access to the project site. Access to some site locations may be restricted to those who have had the appropriate level of training.

Two limited training levels may be acceptable for delivery drivers and site visitors, depending on access location, presence of fully trained personnel, and risk of encountering resources or hazards. Delivery drivers who have limited site access and would only be on-site for a short time may receive a shortened training that is focused on select resources and hazards with which they may come into contact. Similarly, site visitors may receive a shortened training, but must be escorted by a designated SCE or CPUC representative who has received the full training. Workers that receive a limited training must complete the full training before accessing the site without an escort.

If limited training levels are used for delivery drivers and site visitors, SCE should submit each training to the CPUC for review and approval. Each training submittal should indicate the personnel (e.g., delivery drivers) who qualify to receive such training and the anticipated site access the personnel will have.

2.2.5 Surveys

Multiple EPEs and MMs, as well as project permits and plans, require SCE to complete field-based survey requirements, such as formal or protocol level surveys, reconnaissance inventories and evaluations, or clearances. The frequency, timing, and formality of the survey requirements vary depending on the targeted resource and implementation phase. Survey requirements for the project are summarized in Table 2.2-1 by resource topic.

SCE is required to submit pre-construction survey results (in some cases reports) to the CPUC, and if necessary USFWS and CDFW, for review and acceptance prior to initiating construction or any other site development activities. SCE shall provide documentation of USFWS and CDFW acceptance of pre-construction surveys to CPUC prior to initiating construction.

Surveys must be completed by qualified individuals, as applicable and specified in the requirement source. Personnel conducting surveys for several resources must also be approved by the CPUC, and potentially by USFWS and CDFW. Surveyor requirements are the same as those described for specialty monitors addressed in Section 2.2.6.1

Table C-4, located in Appendix C, lists the timing and frequency of required surveys, and will serve as an implementation table for these requirements. Table C-4 will be used to track the status and results of surveys, and will also address the need for any monitoring or avoidance and minimization requirements due to the presence of a resource. Table C-4 will be updated on an ongoing basis throughout implementation of the MMCRP. Survey requirements will be complete when SCE provides adequate documentation that surveys were completed.

Table 2.2-1 Summary of Survey Requirements

Resource/Topic	Requirement Sources	Freq. Before Construction ^a	Freq. During Construction	Freq. After Construction
Coastal California gnatcatcher+	MM BIO-01 (MSHCP)	Once		
Least Bell's vireo*+	MM BIO-01 (MSHCP)	Once		
Southwestern willow flycatcher+	MM BIO-01 (MSHCP)	Once		
Yellow-billed cuckoo+	MM BIO-01 (MSHCP)	Once		
Santa Ana sucker*+	MM BIO-01 (MSHCP)	Once		
Yellow breasted chat ⁺	MM BIO-01 (MSHCP)	Once		
Yellow warbler+	MM BIO-01 (MSHCP)	Once		
Western burrowing owl*+	MM BIO-01 (MSHCP) MM BIO-03	Once		
Migratory birds*+	MM BIO-08	Once	Approximately weekly during nesting season b	
Los Angeles pocket mouse ⁺	MM BIO-01 (MSHCP)	Once		
Northwestern San Diego pocket mouse+	MM BIO-01 (MSHCP)	Once		
San Diego black-tailed jackrabbit*	MM BIO-01 (MSHCP)	Once		
Southern grasshopper mouse*	MM BIO-01	Once		
Stephens' kangaroo rat*	MM BIO-01 (MSHCP)	Once		
San Bernardino kangaroo rat ⁺	MM BIO-01 (MSHCP)	Once		
Western mastiff bat*	MM BIO-01 (MSHCP) MM BIO-03	Once		

Resource/Topic	Requirement Sources	Freq. Before Construction ^a	Freq. During Construction	Freq. After Construction
Western yellow bat*	MM BIO-01 (MSHCP) MM BIO-03	Once		
Coast horned lizard*	MM BIO-01 (MSHCP)	Once		
Red-diamond rattlesnake*	MM BIO-01 (MSHCP)	Once		
Orange-throated whiptail*	MM BIO-01 (MSHCP)	Once		
San Diego banded gecko*	MM BIO-01 (MSHCP)	Once		
Delhi sands flower- loving fly+	MM BIO-14	Once		
Narrow endemic plants*+	MM BIO-01 (MSHCP)	Once		
	MM BIO-03			
Invasive Weeds*+	MM BIO-09A	Once	Annually from the time construction begins	Annually from the time construction begins until 2 years after construction is complete
Jurisdictional wetlands*+	MM BIO-10	Once		
Cultural resources*+	EPE CUL-01	Once		
Geotechnical investigation*+	EPE GEO-01	Once		
Roads and sidewalks*+	MM TRANS-07	Once		Once

Notes:

- ^a If construction is delayed for more than 30 days or otherwise specified, pre-construction surveys may need to be repeated, as determined through coordination with CPUC, and potentially USFWS and CDFW.
- The nesting bird season is generally from February 1 through August 31, but may be earlier or later depending on species' nesting patterns and weather conditions.
- * From 2013 RTRP EIR
- + From SEIR

2.2.6 Field Monitoring

In addition to the general mitigation monitoring effort addressed in the MMCRP, SCE is required to assign specific on-site monitoring duties to select personnel. Several project EPEs and MMs include specific on-site monitoring requirements that must be performed during or following construction to ensure impacts to resources are reduced or avoided. There are two types of monitoring requirements for the project, specialty monitoring and general monitoring, which are both discussed further below.

Monitoring requirements may depend on the presence of sensitive resources identified during surveys listed in Table 2.2-1. The results of surveys and presences of resources will be tracked in Table C-4.

Specialty Field Monitoring

Specialty monitors are required to perform the majority of the monitoring requirements for the project. Personnel performing these tasks must meet the minimum qualifications identified in the associated EPEs and MMs. In addition, agency approval is required for many of the specialty monitors performing these roles. Specialty monitor requirements are listed in Table 2.2-2. Specialty monitors assigned by SCE and approved by the applicable agencies is listed in Table D-1 located in Appendix D.

Table 2.2-2 Summary of Specialty Field Monitoring Requirements

Monitoring Target	Requirement Sources	Minimum Qualifications ^a	Review/ Coordination
Delhi sands flower-loving fly	MM BIO-01A MM BIO-14	Bachelor's degree or above in a biological science field and demonstrated field experience with Delhi sands flower-loving fly	CPUC
Sensitive bat	MM BIO-01A	Bachelor's degree or above in a biological science	CPUC
species	WIIVI DIO 00	*CDFW	
		sensitive bat species	*USFWS
			*RCA
Western	Vestern MM BIO-01A		CPUC
burrowing owl	MM BIO-03		*CDFW
			*USFWS
			*RCA
Special-status	MM BIO-01A	Bachelor's degree or above in a biological science	CPUC
birds	MM BIO-03		CDFW
			USFWS
Nesting birds	MM BIO-01A MM BIO-08	Avian Monitor: Bachelor's degree or above in a biological science field and demonstrated experience surveying or monitoring nesting birds	CPUC

Monitoring Target	Requirement Sources	Minimum Qualifications ^a	Review/ Coordination
Special-status mammals	MM BIO-01A MM BIO-03	Bachelor's degree or above in a biological science field and demonstrated field experience with special-status mammals in the region	CPUC CDFW USFWS
Special-status reptiles	MM BIO-01A MM BIO-03	Bachelor's degree or above in a biological science field and demonstrated field experience with special-status reptiles in the region	CPUC CDFW USFWS
Special-status plants	MM BIO-01A	Bachelor's degree or above in a biological science field and demonstrated field experience with field botany and special-status plants in the region	CPUC CDFW USFWS
Narrow endemic plants	MM BIO-03	Bachelor's degree or above in a biological science field and demonstrated field experience with Narrow endemic plants	CPUC *CDFW *USFWS *RCA
Invasive weeds	MM BIO-09 MM BIO-09A	Bachelor's degree or above in a biological science field and demonstrated field experience with field botany or native plant restoration, and familiar with native and invasive plants in the region	CPUC
Jurisdictional Wetlands	MM BIO-10	Bachelor's degree or above in a biological science field and demonstrated field experience with wetland resources	CPUC

Monitoring Target	Requirement Sources	Minimum Qualifications ^a	Review/ Coordination
Cultural and tribal cultural resources	MM Cultural-02B	Qualified Archaeologist. Experience with California/regional history; and local Native American history, traditions, and customs and shall meet the US Secretary of Interior Professional Qualifications Standards as published in 36 CFR Part 612	CPUC
		Archaeological Monitors. Bachelor's degree in anthropology, archaeology, historic archaeology, or a related field and possesses a minimum of 4 months of supervised field and analytic experience in the archaeology of Southern California.	
		Tribal Cultural Monitor. From consulting tribes (i.e., Pechanga Band of Luiseño Indians and Gabrieleño Band of Mission Indians—Kizh Nation)	
Erosion, sediment, and pollution control	EPE GEO-02 EPE HAZ-03 SWPPP	Qualified SWPPP Developer (QSD) and Qualified SWPPP Practitioner (QSP)	N/A

Notes:

- Minimum qualifications for specialty monitors are specified in the applicable requirement sources. When no specific qualifications were identified, it is expected the individuals performing specialty monitoring will have at least a B.A. or B.S. in a relevant field and sufficient experience and/or training to perform the required monitoring duties adequately.
- * Requirements marked with an asterisk are only applicable under specified conditions, as noted in the requirement source.

General Field Monitoring

Any qualified and designated personnel may perform monitoring tasks where there is no discipline or agency approval requirements specified. General monitor requirements are listed in Table 2.2-3. Personnel performing these roles must be provided the necessary training beyond the minimum worker training requirements covered in the WEAP

² 36 CRF Part 61 states the minimum qualifications are a graduate degree in archeology, anthropology, or closely related field plus: at least one year of full-time professional experience or equivalent specialized training in archeological research, administration or management; at least four months of supervised field and analytic experience in general North American archeology; and a demonstrated ability to carry research to completion.

Table 2.2-3 Summary of General Field Monitoring Requirements

Monitoring Target	Requirement Sources	Training/Designation Requirements
General wildlife entrapment	MM BIO-12	SCE-designated and trained personnel (excavation inspection only; any wildlife removal must be performed or overseen by a qualified biological monitor)
Slope stability	EPE GEO-01 Geotechnical Investigation Report	SCE-designated and trained personnel
Fire hazards	MM HAZ-03 Fire Prevention and Management Plan	SCE-designated and trained personnel

2.2.7 Avoidance and Minimization

All EPEs and MMs, as well as project permits and plans, contain general impact avoidance and minimization goals; however, some requirements from these sources include specific actions to implement if resources are identified during pre-construction surveys or construction clearances. This section addresses avoidance and minimization requirements that will be implemented during construction and restoration activities to avoid or minimize impacts to resources that are present. Impact avoidance and minimization requirements for the project can by summarized by the following actions:

- Avoiding sensitive areas by communicating to workers and through the installation of signs, flagging, and/or barriers
- Avoiding sensitive periods or seasons (e.g., nighttime, wet season, or reproductive seasons)
- Using specific work techniques, materials, or equipment known to reduce impacts
- Scheduling work activities during less sensitive periods or seasons
- Providing ongoing reminders and environmental training to workers

The applicability of avoidance and minimization requirements may depend on the presence of sensitive resources identified during surveys listed in Table 2.2-1. The results of surveys and presence of resources will be tracked in Table C-4.

3 Roles and Responsibilities

SCE and CPUC, including their contractors, are collectively responsible for ensuring environmental impacts addressed in the 2013 RTRP EIR and the SEIR are adequately mitigated; however, SCE is primarily responsible for compliance by implementing project requirements. CPUC is responsible for monitoring SCE's compliance by verifying that implementation is completed adequately and enforcing appropriate corrective actions if the project is not in compliance.

This section describes specific SCE and CPUC roles and responsibilities for the project, and titles that will be assigned to personnel in these roles.

A list of designated personnel who will perform these roles, including their organization and contact information, will be listed in Table D-1 and Table D-2 located in Appendix D. These tables shall be updated as needed throughout implementation of the MMCRP to reflect personnel changes.

3.1 SCE

3.1.1 SCE Compliance Team

SCE Project Manager

SCE is responsible for designating the project manager who will provide overall direction, management, leadership, and corporate coordination for the project. The SCE Project Manager's responsibilities shall include:

- Coordinating construction management, engineering, and SCE's environmental personnel
- Coordinating SCE staff and regulatory agencies to ensure that all agency requirements are met
- Integrating environmental responsibilities into all levels of project construction activities

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 Communicating project activities, schedules, and public relations issues to the project teams

SCE Environmental Project Manager

SCE is responsible for designating an Environmental Project Manager to oversee the overall compliance effort. The SCE Environmental Project Manager shall be the lead SCE representative responsible for implementing environmental requirements and the MMCRP. The SCE

Environmental Project Manager is the primary compliance point of contact for SCE. The SCE Environmental Project Manager's responsibilities shall include:

- Understanding and planning for project requirements and construction needs
- Implementing the environmental inspection and preconstruction survey program, and the Worker Environmental Awareness Training Program
- Coordinating SCE's environmental personnel, and ensuring that qualified monitoring personnel are available and informed of their responsibilities, and have been approved by CPUC and other agencies when applicable
- Communicating environmental requirements to the SCE compliance team and Construction Managers
- Communicating with the CPUC monitoring team regarding environmental requirements, construction needs, construction schedule changes, and MMCRP procedures described in Section 4
- Ensuring compliance with all EPEs, MMs, permit conditions, plan requirements, and the MMCRP
- Ensuring that data, including work schedule, location, and critical issue information, are provided to members of the project construction team, as needed
- Reporting the effectiveness of mitigation and regularly submitting required reports and documentation to CPUC
- Providing leadership to correct any issues with environmental compliance

SCE Compliance Manager

SCE is responsible for designating at least one person to supervise the day-to-day compliance effort. The SCE Compliance Manager shall support the role of the SCE Environmental Project Manager and will supervise the activities of their environmental monitoring team. SCE may designate a consultant or contractor to be the SCE Compliance Manager so long as the consultant/contractor has prior experience in such a role.

SCE Environmental Monitors

SCE is responsible for designating at least one environmental monitor who will be regularly present at the project site to oversee and verify the day-to-day compliance effort. SCE shall designate a Lead Environmental Monitor (LEM) who will be the primary point of contact in the field. The LEM shall work closely with construction personnel and other Environmental Monitors (EM) and shall be the primary field employee responsible for verifying and documenting environmental compliance. Multiple SCE EMs may be needed to effectively monitor compliance during periods of high construction activity or high monitoring demand. The LEM will oversee all SCE EMs. The SCE EM's responsibilities shall include:

Understanding environmental project requirements and construction needs

- Taking direction from the SCE Environmental Project Manager and SCE Compliance Manager
- Coordinating site visits with SCE and CPUC field personnel
- Communicating construction needs and possible conflicts with environmental requirements to the SCE Environmental Project Manager and SCE Compliance Manager
- Supporting construction staff to ensure work is conducted in compliance with environmental requirements
- Overseeing specialty monitoring activities, or performing such duties when appropriate and approved to do so
- Implementing communication procedures described in the MMCRP
- Ensuring that resources are avoided, and impacts are minimized as specified by all project requirements
- Determining the effectiveness of mitigation and reporting whether adjustments need to be made to the SCE Environmental Project Manager and SCE Compliance Manager

SCE may designate the role(s) of SCE Environmental Monitor(s) to a consultant or contractor so long as the consultant/contractor has prior experience in such a role.

SCE Specialty Monitors

SCE is responsible for designating personnel to perform required or as needed specialty monitoring requirements. Agency approval is required for several specialty monitoring roles as well as minimum qualifications. Specialty monitoring roles for the project are listed in Table 2.2-2 above, including minimum qualifications and agency approval requirements for designated personnel performing these roles. EMs may also perform specialty monitoring roles if they possess the appropriate qualifications and experience, and have received applicable agency approval. Table D-1 located in Appendix D lists designated specialty monitors, their contact information, and dates of agency approval, if applicable. SCE may designate the role(s) of SCE Specialty Monitor(s) to a consultant or contractor so long as the consultant/contractor meets all minimum qualifications of such a role.

SCE General Monitors

Several project requirements require general monitoring tasks. General monitoring can be conducted by any personnel if there are no minimum qualifications or agency approval requirements. General monitor requirements are listed in Table 2.2-3 above. Personnel performing these roles shall be provided training specific to the monitoring responsibility that is more detailed than the minimum worker training requirements included in the WEAP. SCE EMs may perform general monitoring tasks in conjunction with their other inspection and monitoring duties if appropriate. SCE may designate the role(s) of SCE General Monitor(s) to a consultant or contractor.

3.1.2 Construction Workforce

Construction Supervisor

SCE shall identify a Construction Supervisor for the project who is responsible for work crews. The Construction Supervisor shall provide support to the SCE Project Manager and oversee the activities of construction personnel. The Construction Supervisor's responsibilities include:

- Implementing contractor compliance with SCE specifications, construction contracts, and applicable codes
- Coordinating with SCE Compliance Personnel regarding implementation of project EPEs and MMs, permit conditions, plan requirements, MMCRP procedures
- In conjunction with the Environmental Project Manager, verifying that all construction workers attend the project environmental training program prior to beginning work
- Planning construction activities around environmental requirements and reporting any potentially infeasible requirements and work area constraints to the SCE compliance team
- Communicating construction needs and schedule changes to the SCE a compliance team
- Regularly facilitating field meetings with construction and environmental staff
- Reporting deviations from compliance and spills (e.g., fuel, water) to the SCE Compliance Manager

Construction Workers

Construction workers who enter the project site are responsible for following all environmental project requirements. Construction workers are responsible for attending required environmental trainings addressed in the WEAP that are applicable to their position. Any questions regarding project requirements shall be directed towards the SCE Construction Supervisors and/or SCE EMs.

3.2 CPUC Monitoring Team

3.2.1 CPUC Project Manager

The CPUC Project Manager is the lead representative for the CPUC and the sole CPUC employee on the CPUC monitoring team. The CPUC Project Manager shall oversee the mitigation monitoring effort and is responsible for making final determinations regarding MMCRP procedures, requirement clarifications, and compliance issues.

3.2.2 CPUC Monitoring Manager

CPUC is responsible for designating a monitoring manager who will support the CPUC Project Manager and provide oversight to the mitigation monitoring effort. The CPUC Monitoring Manager's responsibilities shall include:

- Reviewing CPUC monitoring reports and discussing non-compliance issues with the CPUC PM
- Reviewing reports and other documentation provided by SCE for MM compliance
- Reviewing NTPs, MPRs and Temporary Extra Work Space (TEWS) requests and submitting to CPUC PM for approval and sign-off
- Acting as a project liaison on the CPUC's behalf to work with SCE public affairs staff and address community issues and concerns should they arise
- Working with the SCE compliance personnel to resolve any issues and incidents
- Coordinating with other jurisdictional agencies as needed

3.2.3 CPUC Monitoring Supervisor

CPUC is responsible for designating a monitoring supervisor who will support the CPUC Project Manager and the CPUC Monitoring Manager by overseeing the day-to-day mitigation monitoring effort. The CPUC Monitoring Supervisor shall perform the delegated duties of the CPUC Monitoring Manager. The responsibilities of the CPUC Monitoring Supervisor include:

- Providing oversight of the CPUC monitoring team and conducting routine monitoring activities described in the MMCRP on behalf of the CPUC
- Implementing CPUC's responsibilities for MMCRP procedures, and verifying SCE fulfill their responsibilities
- Reviewing all pre-construction mitigation plans and preparing draft review memoranda for the CPUC PM, and keeping a record of MMCRP procedures
- Coordinating field personnel for the CPUC monitoring team to inspect the project site(s)
- Determining the appropriate frequency of site visits for CPUC environmental inspectors (EIs)
- Conducting regular site visits at beginning of construction, with frequency adjusted as appropriate
- Verifying and documenting SCE's compliance with all project requirements prior to, during, and following construction, and creating independent records of project compliance
- Documenting any incidents with compliance, reporting them to the CPUC PM, tracking the project compliance incidents record, and working

with the CPUC monitoring team and SCE compliance personnel to resolve any compliance incidents

- Reviewing all CPUC, SCE, daily and weekly monitoring reports
- Preparing MMCRP monthly compliance reports and submitting to the CPUC
- Preparing NTPs for the Monitoring Manager's review and CPUC's review and sign-off
- Reviewing and processing MPRs and TEWS requests
- Reviewing SCE's compliance reports for consistency with field observations and identifying and reconciling any inconsistencies
- Coordinating all aspects of the project with the SCE compliance team

3.2.4 CPUC Environmental Inspectors

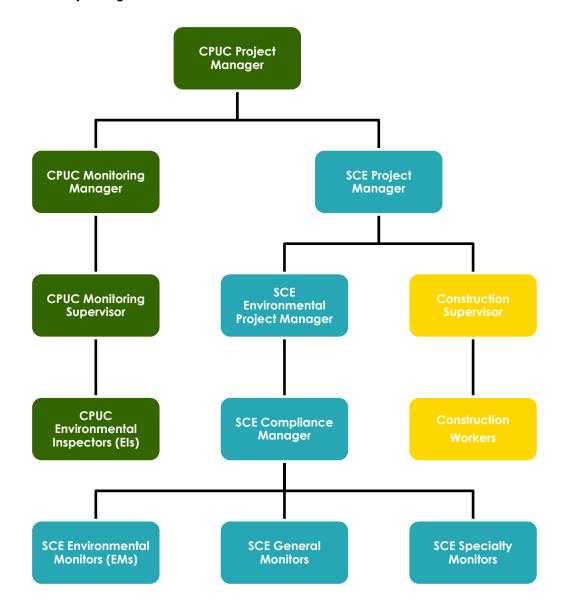
CPUC Environmental Inspectors (EIs) shall be identified for the project. CPUC EIs shall be the primary field personnel for CPUC and responsible for verifying compliance with project requirements at the project site as directed by the CPUC monitoring team. Additional monitors may be used as needed depending on concurrent construction activities and specific monitoring needs. The responsibilities of the CPUC EIs are:

- Inspecting the project site, documenting construction and compliance activities, and reporting any potential issues and incidents
- Preparing and submitting daily monitoring reports to the CPUC Monitoring Supervisor, and relaying any important information about the project delivered in the field

3.3 Project Organization Chart

An organizational chart of CPUC and SCE project personnel is shown on Figure 3.3-1. The organization chart illustrates preliminary lines of communication between project team members. The names of individuals performing the roles and their contact information will be listed in Tables D-1 and D-2 located in Appendix D. CPUC and SCE are responsible for keeping each other informed of staffing changes and providing contact information.

Figure 3.3-1 Project Organization Chart



3.4 Jurisdictional Agencies

In addition to CPUC, local, state, and federal agencies (e.g., California Department of Fish and Wildlife [CDFW], U.S. Fish and Wildlife Service [USFWS], Regional Water Quality Control Boards [RWQCBs], the U.S. Army Corps of Engineers [USACE], and Air Quality Management Districts [AQMDs]) may periodically visit the project site to verify compliance, or request information regarding compliance with various project requirements, or in response to a violation, should one occur.

SCE is responsible for contacting agencies and immediately notifying them of compliance issues within their jurisdictions, ensuring that any documentation sent to a non-CPUC agency in response to requirements in an EPE or MM is also sent to the CPUC Project Manager and Monitoring Manager. If an issue regarding compliance with an EPE, MM, or permit requirement under the jurisdiction of an agency remains unresolved, the CPUC Project Manager, Monitoring Manager, or Monitoring Supervisor may elect to contact the agency directly to discuss resolution.

SCE is responsible for satisfying requests from jurisdictional agencies, submitting the permits and authorizations to CPUC, and notifying CPUC of any changes to agency requirements in a timely manner. SCE shall provide CPUC with documentation (i.e., email correspondence, letters, and/or memoranda) related to final agency approvals, if CPUC is not directly involved with the coordination effort. The CPUC may contact jurisdictional agencies at any time regarding the project and to clarify agency requirements, permit conditions, or approvals relating to their jurisdiction, as needed. The CPUC may also ask that SCE obtain input from the permitting agency or that SCE participates in discussion with the CPUC. The CPUC retains the authority to coordinate directly with other agencies regarding the project and all permit conditions or plan review comments.

4 Procedures

This section addresses MMCRP procedures for personnel identified in Section 3 that shall be implemented prior to, during, and following construction, in order to facilitate successful implementation and documentation of project requirements. Procedures in this section include general communication guidelines, standard CPUC practices, and documentation tools developed from experience with past CPUC projects that involved mitigation monitoring oversight.

4.1 Communication Guidelines

Clear communication will be critical for successful implementation of the MMCRP and will reduce the likelihood of issues that may arise, such as project delays, compliance violations, and safety incidents. Environmental and construction personnel must regularly communicate and maintain professional and responsive communications at all times. The SCE compliance team and CPUC monitoring team must coordinate closely to clarify questions regarding implementation before issues occur, to develop expectations regarding compliance documentation, and to resolve any issues that may arise in a timely manner. This section addresses general communication procedures for the project.

4.1.1 Pre-Construction Compliance Coordination

SCE is required by the terms of the EPEs and MMs 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 this pre-construction process, SCE will 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 pre-construction 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 EPEs and MMs as they apply to the project or phased project segment. The goal of the pre-construction process is to complete all required actions so the CPUC and other agencies, as appropriate, can issue NTP authorizations.

4.1.2 Communication Protocol During Construction

Many MMs were derived from agency input. SCE along with CPUC Monitoring Manager , will be responsible for contacting resource agencies and immediately notifying them of compliance incidents arising regarding matters under their jurisdiction. CPUC shall be provided copies of all relevant correspondence, approvals, or authorizations from the resource agencies that facilitate resolution of the compliance incident. If an unresolved compliance conflict with an

4 PROCEDURES

EPE, MM, or Project Plan affects a permit requirement under the jurisdiction of a resource agency, SCE or the CPUC Monitoring Manager will contact the agency to discuss resolution in conformance with the procedures set forth in Section 3.4.

Daily Communication During Construction

Many of the problems that arise during construction can be resolved in the field through regular communication between CPUC EIs, SCE, and construction contractors. Field staff will be equipped with cell phones and will be available to receive phone calls at all times during regular construction hours. A project contact list has been included in Appendix D. The organization chart depicted in Section 3.3 illustrate the lines of communication to be used during construction.

The following provides additional guidelines to ensure effective communication in the field.

CPUC Environmental Inspectors

The CPUC EI's primary point of contact in the field is SCE's LEM. The CPUC EIs will contact SCE's LEM if an activity is observed that conflicts with one or more of the EPEs or MMs, so that the situation can be corrected. Similarly, the CPUC EI will contact SCE's LEM for information on where construction crews are working. The CPUC EI will contact SCE's Environmental Project Manager regarding the status of EPEs and MMs, and schedule forecasts. The CPUC EI may discuss construction procedures directly with the construction contractors as long as a representative from SCE's compliance personnel is present during the discussion. The CPUC EI will contact the designated SCE representative if a problem is noted that requires action from the contractor. The CPUC EI will not direct the contractor; however, the CPUC EI has the authority to stop work, assuming it is safe to do so, if an activity poses an imminent threat to resources or puts a sensitive resource at undue risk (e.g., stopping a clearing crew from unknowingly cutting sensitive vegetation in an exclusion area).

SCE

SCE will provide the CPUC Monitoring Supervisor and EI with a list of construction monitoring personnel and construction supervisory staff to contact regarding compliance incidents. The contact list will include each person's title, responsibility, contact information, and whether their position is segment-specific. The contact list will be updated as new project personnel are assigned to the project and redistributed as necessary. SCE will prepare and distribute a Weekly Compliance Report for distribution to key project members, including the CPUC (see Section 4.4.1 below). The CPUC Monitoring Supervisor will review the weekly report to ensure that the status of EPEs and MMs is consistent with observations in the field. Any questions regarding the status of EPEs or MMs will be directed to the SCE Environmental Project Manager. The Weekly Compliance Report will also be a tool to keep all parties informed of construction progress.

Note: Daily Compliance Reports will be prepared by CPUC EIs and Weekly Compliance Reports will be prepared by the CPUC Monitoring Supervisor as described in Section 4.4.2.

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Weekly Progress Meetings During Construction

The SCE Project Manager, SCE Environmental Project Manager, SCE Compliance Manager, CPUC Project Manager, CPUC Monitoring Manager, CPUC Monitoring Supervisor, and other parties may participate in a weekly teleconference call or as otherwise agreed-upon schedule. The teleconference calls will be scheduled for an agreed date and time and will be used to identify actual or potential compliance risks and discuss solutions. The conference calls will focus on the MMCRP and project progress generally. The status of any pending NTP, MPR, or TEWS requests or corresponding pending approvals will also be discussed. The results of all meetings shall be documented in MMCRP reports prepared by SCE and CPUC.

Site Visit Coordination

Field personnel from SCE and CPUC shall coordinate site visits with the SCE LEM who is familiar with authorized construction activities, project requirements, and any restricted areas (i.e., dangerous conditions, unauthorized work areas or work on private properties, or the presence of sensitive resources). Conditions in the field may change rapidly and SCE field personnel must ensure that all field personnel are adequately informed of restricted areas, parking locations, and communication procedures on an ongoing basis.

A CPUC EI shall conduct routine site inspections. Site inspections would generally be conducted when project activities are occurring; however, site visits may be conducted during inactive periods if necessary. At a minimum, the CPUC EI will coordinate with the SCE LEM prior to visiting the site. The SCE Environmental Project Manager and Compliance Manager shall be copied on all site visit coordination. If contact cannot be made, the CPUC monitoring personnel will inspect open project areas on foot. The CPUC EI shall at no time pass through fences unless authorized or escorted by a member of the SCE compliance team who is familiar with the property.

4.1.3 Questions and Clarifications

Questions and the need to clarify project requirements will periodically arise throughout the implementation process. SCE, and CPUC shall submit important questions and clarifications in writing via email. Resolutions and any CPUC determinations shall be documented in compliance and monitoring reports, and/or in email correspondence. Questions and clarifications that take an extended period of time to resolve shall be tracked by the CPUC monitoring team until a resolution has been reached.

4.1.4 Requests for Documentation

The CPUC monitoring team may periodically request written documentation and confirmations from the SCE compliance team that will be entered into the project record. Requests for documentation and confirmations shall be submitted via email. If the information will take an extended period of time to gather, both SCE and CPUC shall agree upon a timeframe to respond, and the request shall be tracked by the CPUC monitoring team until a resolution has been reached.

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4.1.5 Construction Schedule

SCE shall inform the CPUC monitoring team immediately of any delays in the construction schedule as laid out in the MMCRP that may affect the Project and implementation of the MMCRP.

4.1.6 Dispute Resolution

Disputes or complaints may develop between SCE and CPUC if there are conflicting opinions regarding project requirements and procedures. It is expected that the MMCRP will reduce or eliminate the potential for disputes; however, disputes may occur even with the best preparation.

Any issues shall first be addressed informally at the field level between the CPUC EI and SCE LEM. The CPUC EI or SCE LEM will notify the SCE Environmental Project Manager and CPUC Monitoring Manager via email, telephone, or during project progress meetings to seek informal resolution to the issue. Questions may be directed to other members of the SCE compliance team and the CPUC monitoring team as needed. If the issue cannot be resolved informally in the field or with the assistance of the SCE Environmental Project Manager and CPUC Monitoring Manager, the following procedures shall be implemented:

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

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

4.2 Pre-Construction Compliance Verification

SCE is required by the terms of the EPEs and MMs 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. The plans, surveys, studies, and other documentation required to be completed by SCE before construction are listed in the EPE and MM table in Appendix B.

Other agencies may review documents prior to or concurrent with the CPUC if required by the EPEs or MMs or permitting requirements. Compliance with all pre-construction EPEs and MMs presented will be verified prior to construction.

The CPUC third-party monitors, Monitoring Manager, Monitoring Supervisor, and technical experts will review all mitigation plans and reports and provide comments, as applicable. As required by the EPEs and MMs, resource agencies will also be involved in the review of applicable plans and reports and will provide comments. Comments on these documents will be provided to CPUC to ensure that they adequately accomplish the intended mitigation for impacts and meet the EPE, MM, or permit requirements. For required local and State agency permitting/consultations, the CPUC third-party monitors will track SCE's progress as it relates to SCE's construction plans and project mitigation and permitting requirements. Based on SCE's construction plans, CPUC may authorize construction to begin on a phased basis and the CPUC third-party monitors will handle pre-construction compliance review accordingly. CPUC may issue NTPs for construction of each phase separately, as soon as pre-construction compliance is satisfactorily accomplished for that phase.

4.3 Notice to Proceed Process

SCE is required to obtain CPUC authorization prior to initiating project activities through the Notice to Proceed (NTP) process. The NTP process involves the SCE Compliance Team submitting an NTP request package to the CPUC monitoring team, and the CPUC Project Manager issuing an NTP Authorization Letter. Project activities may be authorized through one or more NTPs for separate project phases as determined necessary by the SCE compliance team and the CPUC monitoring team. At a minimum, NTP request packages shall include the following information:

- NTP request number
- Date submitted to CPUC
- Requested approval date
- Anticipated start and end date for the proposed actions
- A detailed description of the proposed actions requested in the NTP
- A summary list of any previously authorized actions (if applicable) as detailed in NTP Authorization Letters
- A summary list of any actions that have not been proposed or authorized that must be included with future NTP requests

- Updated versions of the six requirement tracking tables described in Section 5.1 (Tables C-1, C-2, C-3, C-4, C-5 and C-6)
- A summary list of any outstanding requirements and documentation not included with the NTP package, and the anticipated dates it will be provided
- Any Minor Project Refinements or Temporary Extra Workspace related to the proposed actions (refer to Section 4.6)

The CPUC monitoring team shall review NTP requests to ensure the proposed actions are consistent with the SEIR and final CPUC decision, and to verify compliance with all preconstruction requirements. The CPUC monitoring team may request additional information during the NTP review process as needed. Once it has been determined that all pre-construction requirements have been completed and documented to the satisfaction of CPUC, the CPUC Project Manager will submit an NTP Authorization Letter to the SCE compliance team. The NTP Authorization Letter will address any conditions of approval and include applicable documentation as necessary for the authorized actions.

Note: A template for NTP requests is provided in Appendix E. It is highly suggested that SCE consult the CPUC well in advance of submitting NTP requests to establish clear expectations. Incomplete NTP requests may result in delays to the construction schedule.

4.4 Compliance Reporting During Construction

4.4.1 SCE

SCE is responsible for preparing general MMCRP reports to document all construction and compliance activities, as well as specific reports identified in EPEs and MMs. Reporting activities may also be required by permits and plans. Table C-6 in Appendix C defines SCE's specific reporting requirements specified in EPEs and MMs, and/or project plans. Table 4.4-1 summarizes SCE's general reporting requirements associated with the compliance effort.

The Weekly Compliance Summary Report will be used to elaborate on important details described in Daily Compliance Reports and does not need to address every construction or compliance activity, especially if activities are proceeding in an ongoing and continuous manner.

Table 4.4-1 Summary of General SCE Reporting Requirements

Report	Preparation/Submittal Frequency	Requirement Sources	Contents			
During Construction						
Daily Compliance Reports	Prepared daily and submitted to CPUC upon request during construction	MMCRP	Detailed description of the construction and compliance activities, as well as any issues, resolutions, and MMCRP procedures implemented, for each work day. Reports should include supporting photographs.			
Weekly Compliance Summary Reports	Prepared and submitted to CPUC weekly during construction	MMCRP *MM CUL-02B: Cultural Resources Monitoring, Evaluation, and Treatment of Resources	Summary of Daily Compliance Reports with supporting photographs, weekly totals for the number of compliance and construction personnel (separate values) on-site, and a description of any important meetings during the reporting period. Any Incident Reports and supporting documentation shall be attached. The compliance summary reports will serve as the core method for SCE to communicate project activities to CPUC and to document their compliance effort. *Summary of the discovery findings and evaluation conclusions of non-historic or			
			unique resource shall be documented and provided.			
Incident Reports	Prepared and submitted to CPUC within one business day of observation	MMCRP	Detailed description of incidents as described in Section 4.5.			
After Construction						
Final Construction Compliance Report	Prepared and submitted to CPUC once within 90 days following construction	MMCRP	Summary of all construction and compliance activities that occurred prior to and during construction, summary of issues and resolutions, discussion of project outcomes and any lessons learned for future projects, and a status update for all project requirements (Table C-1 and requirement tracking tables).			

Note:

^{*} Requirements marked with an asterisk are only applicable under specified conditions.

4.4.2 CPUC

CPUC is responsible for preparing general MMCRP reports to document the status and results of the mitigation monitoring effort, to summarize the information provided by SCE at an executive level, and to track important information about the project. Table 4.4-2 summarizes CPUC's general reporting requirements associated with the mitigation monitoring effort.

Table 4.4-2 Summary of General CPUC Reporting Requirements

Report	Preparation Frequency	Requirement Sources	Contents
Daily Inspection Reports	Prepared daily and submitted to CPUC monthly during construction, or upon request	MMCRP	Detailed description of the construction and compliance activities, as well as any issues, resolutions, and MMCRP procedures implemented, for each day CPUC Environmental Monitors (EMs) visit the site
Monthly Monitoring Summary Reports	Prepared and submitted to CPUC monthly during construction	MMCRP	Summary of Daily Monitoring Reports and SCE's Weekly Compliance Summary Reports, important documentation provided by SCE (e.g., reports and logs), a description of any important meetings and discussions, and MMCRP procedures that were implemented during the reporting period
Post- Construction Monitoring Report	Prepared and submitted to CPUC once following construction	MMCRP	Summary of all monitoring activities that occurred prior to and during construction, summary of issues and resolutions, discussion of project outcomes and any lessons learned for future projects, and a status update for all project requirements (Table C-1 and requirement tracking tables) with a summary of any remaining tasks that must be completed
Final Monitoring Report (if necessary)	Prepared and submitted to CPUC once to finalize MMCRP implementation	MMCRP	Summary of all monitoring activities that occurred following construction and compliance with requirements that were not documented as complete in the Post-Construction Monitoring Report
			The necessity of the report will be determined by the CPUC Project Manager

4.5 Non-Compliance Incidents and Stop-Work Orders

The goal of this MMCRP is to plan for and avoid any issues that could occur during implementation; nonetheless, there is a potential for issues to arise due to a variety of factors. For the purposes of this MMCRP, any issues that are observed with compliance, issues related to health and safety, or public complaints shall be documented as incidents. This section addresses incidents that may occur and procedures that shall be followed to document them.

4.5.1 Incident Categories

Incident categories for the project include compliance level incidents, health and safety incidents, and public complaints.

Compliance Level Incidents

SCE and CPUC are responsible for evaluating compliance and addressing any issues throughout implementation of the MMCRP. Issues with compliance will be documented by assigning one of four severity levels and associated terms. A description of compliance levels that will be used for the project and examples of compliance level incidents are listed in Table 4.5-1. SCE will document compliance incidents using the Field Reporting Environmental Database (FRED). Table 4.5-1 identifies FRED compliance terms that correspond to the CPUC incident compliance levels.

When documenting compliance level incidents, the reporting party shall assign an initial compliance level that appropriately represents the severity of the issue based on factors including, but not limited to the following:

- Scope of the deviation or violation
- Risk of impact to resources
- Actual impact to resources
- Number of repeated issues
- How the incident could have been prevented

Table 4.5-1 Compliance Levels

Incident Compliance Level, Reporting Term, and Severity	CPUC Compliance Terminology	SCE FRED Compliance Level Terminology	Examples
Minor Compliance Incident (low severity)	An action that only slightly or partially deviates from project requirements and does not have the potential to cause or cause impact on an environmental resource.	Observation: Observed project activities that do not currently result in non-compliance with an APM or MM, but may result in an incident in the future if not addressed. Observations can require corrective actions to prevent any potential incidents.	 One-time use of an unapproved, preexisting access road. Failure to properly maintain an erosion or sediment control structure, but the structure remains functional.
Non-compliance Level 1 (low to moderate severity)	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.	FRED level 1: Upon notification, the Construction Team will be required to take action. Whenever possible, corrections should be made immediately but will typically not impact construction progress. These discussions will be documented in EDMR with the contact person's name and the corrective action (e.g., water truck was dispatched to site and applied water to suppress dust) noted. The correction implemented should result in no impact to sensitive resources, and immediate notification to Subject Matter Field Lead is not required.	 Failing to properly maintain erosion control structures, resulting in minor runoff that does not impact a sensitive resource. Work or staging materials outside of approved work limits where the incident is within a previously disturbed area, such as a gravel lot.
Non-compliance Level 2 (moderate to high severity)	An action that deviates from project requirements or mitigation measures that has caused, or has the potential to cause, minor impacts on environmental resources.	FRED Level 2: Minor Incident environmental issue can be resolved without a significant delay in construction activities. This work halt will give the monitor time to identify the exclusion area to avoid any further potential impacts to resources, if required, before allowing the resumption of work in a sensitive area.	 Construction activities occurring within an exclusion zone with indirect impacts on sensitive species or significant cultural resources that can be rectified or halted before causing permanent damage. A fuel tank was stored overnight within specified

Incident Compliance Level, Reporting Term, and Severity	CPUC Compliance Terminology	SCE FRED Compliance Level Terminology	Examples
			limits of a water body without secondary containment, but did not result in the release of hazardous materials.
Non-compliance Level 3 (high severity)	An action that deviates from project requirements and has caused, or has the potential to cause, major impacts on environmental resources.	FRED Level 3: A "Level 3 - Major Incident" event is a major environmental incident that is not in compliance with the APMs, MMs, permit condition, approval (e.g., variances, addendums) requirements, and/or environmental construction specifications; violation of the law; or documented repetitive occurrences of Level 2 Minor Incident events, including but not limited to: • Construction activities occurring in an exclusion zone with direct impacts to sensitive or endangered species, cultural resources, human remains, or an archaeological site • Eminent danger or documented impact to a sensitive or endangered species • Repeated deviation from required mitigation measures/requirements that have been repeatedly documented as Level 2 - Minor Incidents • Improper installation of erosion or sediment control structures resulting in sedimentation or impacts to water quality or putting sensitive resources at risk	 Mobilization of equipment or materials to a work site prior to receiving NTP authorization from CPUC. Soil or construction material was placed outside of an approved work area in an environmentally sensitive area. Erosion control BMPs failed during a storm and sediment was discharged into a sensitive area. Project vehicles entered a sensitive resource exclusion area and damaged a resource. Project personnel continued to operate equipment after being requested to halt temporarily by the El or EM.

A non-compliance Level 2 may be issued when Level 1 incidents are repeated. A non-compliance Level 3 may also be issued if Level 2 incidents are repeated. Level 3 compliance incidents may result in a full or partial project shutdown following a stop-work order from the CPUC Project Manager. The need to change initially reported compliance levels may arise if the incident level was over- or under-reported. The CPUC Project Manager shall make final determinations regarding the appropriate compliance level for each incident as needed, and the CPUC monitoring team shall maintain a record of all incidents for the project that will be analyzed in the Post-Construction and Final Monitoring Reports.

Health and Safety Incidents

SCE and CPUC's most important responsibility is maintaining safe working conditions and protecting the public including workers from exposure to hazards related to the project. Any events (i.e., accidents or near misses/close calls) or issues observed with health and safety procedures shall be documented as an incident. SCE and CPUC shall provide notification and prepare Incident Reports for health and safety incidents; however, health and safety incidents will not necessarily reflect negatively on SCE's environmental compliance record unless a specific project requirement, permit, or plan requirement was violated.

Public Complaints

The public may take issue with one or more aspects of the project. EPE NOI-01 requires that a telephone hot-line is established to allow the public to report any construction-related noise complaints. EPE NOI-02 includes specific requirements for investigating and addressing noise complaints from the public. All other public complaints that do not relate to noise shall be documented as an incident. Public complaints may be submitted formally to SCE or CPUC, or informally to field personnel at the project site.

SCE may elect to work with members of the public to resolve any complaints. The CPUC monitoring team shall not intervene with SCE's resolution process unless the complaint is related to specific compliance requirements or a previously unidentified impact related to CEQA review. The CPUC Project Manager shall make any final determinations regarding the necessity of corrective actions following public complaints. SCE shall provide weekly summaries of public complaints and how each complaint was addressed in the Weekly Compliance Report.

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

4.5.2 Notification

SCE and CPUC shall notify one another of incidents within one business day of the initial observation so the issues can be adequately addressed. Response procedures do not need to be finalized when initial notification is provided.

Jurisdictional agencies may also require notification if incidents are documented that relate to their jurisdiction over the project. CPUC will determine if other agencies should be notified

when incidents are documented and either contact agency representatives directly, or direct SCE to do so and to provide documentation.

The incident communication process is described below.

- A non-compliance may be observed by the CPUC Environmental Monitor 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 Environmental Monitor
 will contact the CPUC Project Manager and SCE Environmental Project
 Manager immediately, as described further below. If the non-compliance
 does not require immediate resolution, the incident will be discussed in a
 phone call or email to the SCE Environmental Project Manager or on the
 weekly conference call.
- If the incident is minor and can be easily resolved in the field by providing clarification to construction crews, or if it requires immediate action to prevent an easily avoidable but serious environmental impact, or if time is needed to investigate a compliance incident further, the CPUC Environmental Monitor will notify the CPUC Project Manager, who may authorize a temporary hold. The temporary hold will be verbally conveyed by the CPUC Project Manager to the SCE Environmental Project Manager to halt construction in a safe manner.
- Once the issue is resolved and after the CPUC Environmental Monitor consults with the CPUC Project Manager, the CPUC Environmental Monitor will verbally authorize the lift of the hold to SCE's Environmental Project Manager. If the issue is not fully resolved and may require further action or management discussions, the CPUC Project Manager will issue a stop-work order or stand-down.
- If on-site SCE environmental monitors 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 Environmental Monitor may record the noncompliance in their daily report. Level 1 incidents are "issued" in the site inspection form itself. Level 2 or 3 incidents require consultation with the CPUC Monitoring Supervisor and are issued in separate formal reports to SCE.
- If an incident is self-reported by SCE, the same procedure listed above (see preceding bullet) will be followed, depending on the incident's severity. SCE will immediately contact the CPUC Project Manager and Monitoring Supervisor for serious incidents and report minor compliance incidents via email and phone call. The CPUC Monitoring Supervisor will send an email notification to the SCE EC 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.

- Following the initial discovery or report, the CPUC Project Manager and/or Monitoring Supervisor 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 Project Manager and/or Monitoring Supervisor will direct SCE to submit the information via email or through a formal Non-compliance Incident Report, according to the incident severity. The CPUC Project Manager and/or Monitoring Supervisor 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
 weekly report. For serious non-compliance incidents, the CPUC Project
 Manager may issue a stop-work order, as described below (refer to
 Section 4.5.4). Work will be suspended within the affected area until a
 resolution can be planned, and the CPUC Project Manager authorizes the
 resumption of construction activities in writing.
- A stand-down may be issued by the CPUC Project Manager, or SCE, as
 described in Section 4.5.4. Work will be temporarily halted 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 Project Manager will be subject to further non-compliance notices and potential stop-work orders.
- Serious or emergency compliance incidents that occur on the weekend or after normal business hours (i.e., 8:00 a.m. to 5:00 p.m.) will be addressed by staff identified as emergency contacts on the Project Contact List (refer to Appendix D).
- 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 to the CPUC of official notifications and submittals sent to other
 agencies. If the CPUC finds that a notification to another agency is
 required, it may direct SCE to notify the other agency.

4.5.3 Incident Reports

Incident Reports shall be prepared by the observing party (either SCE or CPUC) and submitted to the alternate party within one business day of the observation if a Non-compliance Level 1, 2 or 3 is documented. A sample Incident Report Form is provided in Appendix E. Incident Reports are not required if a Minor Compliance Incident is documented. At a minimum, Incident Reports must include the following information:

- Incident Category
- Compliance Level (if applicable)

- Incident Start Date (i.e., date event began if known or initial observation date)
- Summary of Incident (i.e., description of the event or observation, personnel present, and actions taken to resolve the issue)
- Resolution Date (if known)

Incidents shall be addressed in MMCRP reports prepared by both SCE and CPUC as described in Section 4.4 (e.g., daily, weekly, monthly, and post-construction reports), and Incident Reports shall be attached to the MMCRP reports for the applicable period.

In addition to Incident Reports, events rising to the level of Non-compliance may require preparation of memoranda in order to describe the event in greater detail and the corrective actions necessary to bring the project back into compliance.

4.5.4 Construction Halts, Stop-Work Orders and Stand-Downs

Several scenarios may occur during project construction for which the CPUC monitoring team may need to communicate immediately with field staff to halt construction activity, including temporary halts, stop-work orders or stand-downs.

Temporary Halt

A temporary halt would be a short-term (i.e., less than eight hours) cessation of construction activities that could be called by CPUC Environmental Monitors. This halt would be used in circumstances where minor clarification of a mitigation measure or resolution of a minor issue by the field compliance crews is necessary to ensure environmental compliance, or where a serious environmental infraction would occur without immediate intervention. CPUC Environmental Monitors would consult with the CPUC Project Manager in the case of a temporary halt, and are authorized to end the halt with clear communication to the SCE field coordinators, if the monitor confirms that environmental compliance will be achieved. Depending on the issue, a temporary halt could transition to a stop-work order (see below).

Stop-Work Order

In the event that a serious non-compliance or safety issue occurs (e.g., take of a listed species; repeated, high-level, non-compliance incidents concerning the same resource; or serious worker injury), the CPUC may elect to issue a stop-work order. The stop-work order would be issued in writing by the CPUC Project Manager, and may require work to stop on all or portions of the project, or on certain construction activities, for a specifically stated time period, as determined by the CPUC Project Manager 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 monitoring team. Resolution of the compliance issue would be communicated in writing by SCE to the CPUC Project Manager, who would then issue an end to the stop-work order in writing. SCE would be required to implement any temporary halt 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 immediately calling 9-1-1.

Stand-Down

Either the CPUC Project Manager, 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 Project Manager. As indicated, a stand-down can be a voluntary action by SCE and should be issued in writing (email is acceptable) with clear timelines and recommendations outlined. Resolutions resulting from a stand-down should be submitted in writing to the CPUC Project Manager. A stand-down called by SCE does not require approval by the CPUC to restart work. Stand-downs should be implemented only after all other attempts at resolution have proven unsuccessful.

4.5.5 CEQA Citation Program

The CPUC may exercise the CEQA Citation Program adopted by the CPUC in Resolution E-4550. The program delegates authority to CPUC staff to draft and issue citations and levy fines for non-compliance with CEQA requirements. The Resolution allows Commission staff to efficiently issue fines when needed to quickly address non-compliance incidents that are occurring in the field.

4.6 Project Changes

4.6.1 Minor Project Refinements

SCE may identify a need to refine one or more aspects of the project following CPUC's final decision due to final engineering specifications. In such cases, SCE is required to submit Minor Project Refinement (MPR) requests to the CPUC monitoring team and obtain authorization from the CPUC Project Manager through the process described in this section.

Approval for MPR requests will only be granted if the proposed refinements achieve or exceed the level of environmental protection approved in the 2013 RTRP EIR and SEIR, are consistent with CEQA requirements, and comply with the EPEs and MMs identified in the 2013 RTRP EIR and SEIR. Requests for project refinements that do not fall within the authority delegated to the CPUC Project Manager as defined in the CPUC's final decision must be sought through a Petition for Modification pursuant to Rule 16.4 of CPUC's Rules of Practice and Procedure.

Proposed project refinements will not be authorized by the CPUC Project Manager through the MPR process if they would meet one or more of the following criteria:

- Involves modifications that would be outside the geographic boundary of the study area utilized in the 2013 RTRP EIR and SEIR
- Would create a new significant impact or substantial increase the severity of a previously identified significant impact, based on the thresholds used in the 2013 RTRP EIR and SEIR
- Trigger additional permit requirements that are not defined in the 2013 RTRP EIR and SEIR or MMCRP
- Conflict with any EPE or MM, or any applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy
- Require new conditions for approval, without which the modifications
 would result in a new significant impact or substantially increase the
 severity of a previously identified significant impact

At a minimum, MPR requests must include the following information:

- MPR request number
- Date submitted to CPUC
- Requested approval date
- Anticipated start and end date for the proposed actions associated with the refinements
- A detailed description of the proposed refinements, including an explanation of why the refinements are necessary
- A summary list of applicable project requirements (e.g., EPEs, MMs, project parameters, or other project stipulations) for which the refinements are being requested
- Supporting photos, maps, and other documentation illustrating the difference between the existing conditions in the area, the approved project, and the proposed refinements
- The dimensions and area of any additional work areas and land disturbance associated with the proposed refinements
- A detailed description of potential impacts of the proposed refinements, including a discussion of each environmental issue area that could be affected by the refinements with accompanying verification that there will be no increase in significant impacts to resources affected by the project and no new significant impacts, after application of previously adopted mitigation
- A summary of water feature and stormwater considerations including any changes to jurisdictional features and the use of erosion and sediment control BMPs

- A statement describing if the proposed refinements would conflict with any EPE, MM, applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy
- Evidence of SCE's consultation with applicable agencies and any Native American tribes, to the extent applicable

The CPUC monitoring team shall review MPR requests to ensure the proposed refinements are consistent with the 2013 RTRP EIR and SEIR and final CPUC decision. The CPUC monitoring team may request additional information during the MPR review process as needed. If it is determined that the MPR request includes sufficient evidence that the proposed refinements are necessary, there are no environmentally preferable alternatives to the refinements, and the refinements would not meet one or more of the exclusionary triggers, then the CPUC Project Manager would authorize the refinements by issuing a MPR Authorization Letter at their discretion. MPR Authorization Letters will address any conditions of approval, and include applicable documentation as necessary.

Examples of potential MPRs, depending on their location, may include the following:

- Adding a temporary extra work area for no more than 60 days of use if the proposed location is in a previously disturbed area with no adjacent sensitive resources or land uses
- Substituting or replacing a previously authorized work area with an alternate work area that is in a previously disturbed area with no adjacent sensitive resources or land uses
- Adjusting the alignment of a project to avoid unanticipated impacts
 related to cultural artifacts, buried utility infrastructure, hazardous and
 toxic substances, and other land use impacts including effects on
 homeowners, 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
- Adjusting the alignment of a project to avoid 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 2013 RTRP EIR or SEIR, or which requires adjustments in order to facilitate construction, so long as the finalized design does not create a new significant impact or a substantial increase in the severity of a previously identified significant impact

4.6.2 Temporary Extra Workspace

For the purposes of this MMCRP, TEWS is defined as a preexisting developed space (e.g., no site preparation is required) that would be used by SCE during construction for a period of up

to 60 days, and that was not specifically identified and evaluated during the CEQA process. Additional workspace requests that would be used for more than 60 days must be processed as an MPR (refer to Section 4.6.1). If SCE determines a need for a construction TEWS, it must submit such a request to the CPUC, consistent with the communication protocol. SCE will not be permitted to use a TEWS prior to receiving written authorization from the CPUC.

SCE must demonstrate that:

- The TEWS is located in a disturbed area with no sensitive resources or land uses onsite or within proximity of the proposed work space such that they may be significantly impacted by the work,
- SCE has the permission of the applicable landowner (e.g., municipality or private) to use the work space, and
- Use of the TEWS will not result in any new significant environmental impacts.

Following is a list of the specific information that SCE will be required to submit with its TEWS request (see Appendix E for form):

- Date of request
- Location of the TEWS (detailed description, including maps if required)
- Property owner of TEWS
- An explanation of the need for the TEWS
- An analysis that demonstrates no new significant impacts will result from use of the TEWS including: compaction contributing to runoff rates or other stormwater/watershed effects; observed existing impacts to the site, such as the presence of potentially hazardous or polluting substances that could pose a risk to Project personnel or the public; abandoned vehicles, equipment, or other materials; or other sensitive resources
- Biological and botanical surveys if appropriate
- Cultural resource survey if appropriate
- Duration and dates of expected use of the TEWS
- Details of the expected condition of the site after use

5 Records Management

5.1 Tracking Systems

5.1.1 Requirements

The CPUC monitoring team will track the status and completion of key project requirements using the following matrix tracking tables located in Appendix C:

- Table C-1: Permits and Authorizations Tracking
- Table C-2: Plans Tracking
- Table C-3: Notifications Tracking
- Table C-4: Surveys Tracking
- Table C-5: Specific Personnel Qualification Requirements Tracking
- Table C-6: Specific SCE Reporting Requirements Tracking

The CPUC monitoring team and SCE compliance team shall use these tables to communicate status updates and the completion of the listed requirements during the NTP process. The dates and descriptions added to the matrix tracking tables shall be supported by referenced documentation, as specified in the requirement sources (e.g., EPEs, MMs, permits, plans, etc.).

Compliance with repetitious requirements that would be implemented throughout construction (e.g., wildlife clearances, field monitoring, avoidance and minimization activities) shall be documented in the daily and weekly reports prepared by SCE and the CPUC (refer to Section 4.4.1 and 4.4.2).

Requests and Authorizations

CPUC will track the dates and criteria of important requests and authorizations for the project (e.g., NTPs, MPRs, and TEWS) as part of the Monthly Monitoring Summary Report.

Incidents

A summary of any incidents will also be tracked as part of the Monthly Monitoring Summary Report, and the CPUC monitoring team will maintain a master table of incidents that will be evaluated in the Final Monitoring Report (refer to Section 4.4.2).

Supporting Documentation

The CPUC monitoring team shall maintain records of all reports, memoranda, and other supporting documentation that are used to verify compliance. These records will be attached to the Monthly Mitigation Monitoring Reports or the Final Mitigation Monitoring Report, unless otherwise determined confidential by the CPUC Project Manager.

5 RECORDS MANAGEMENT

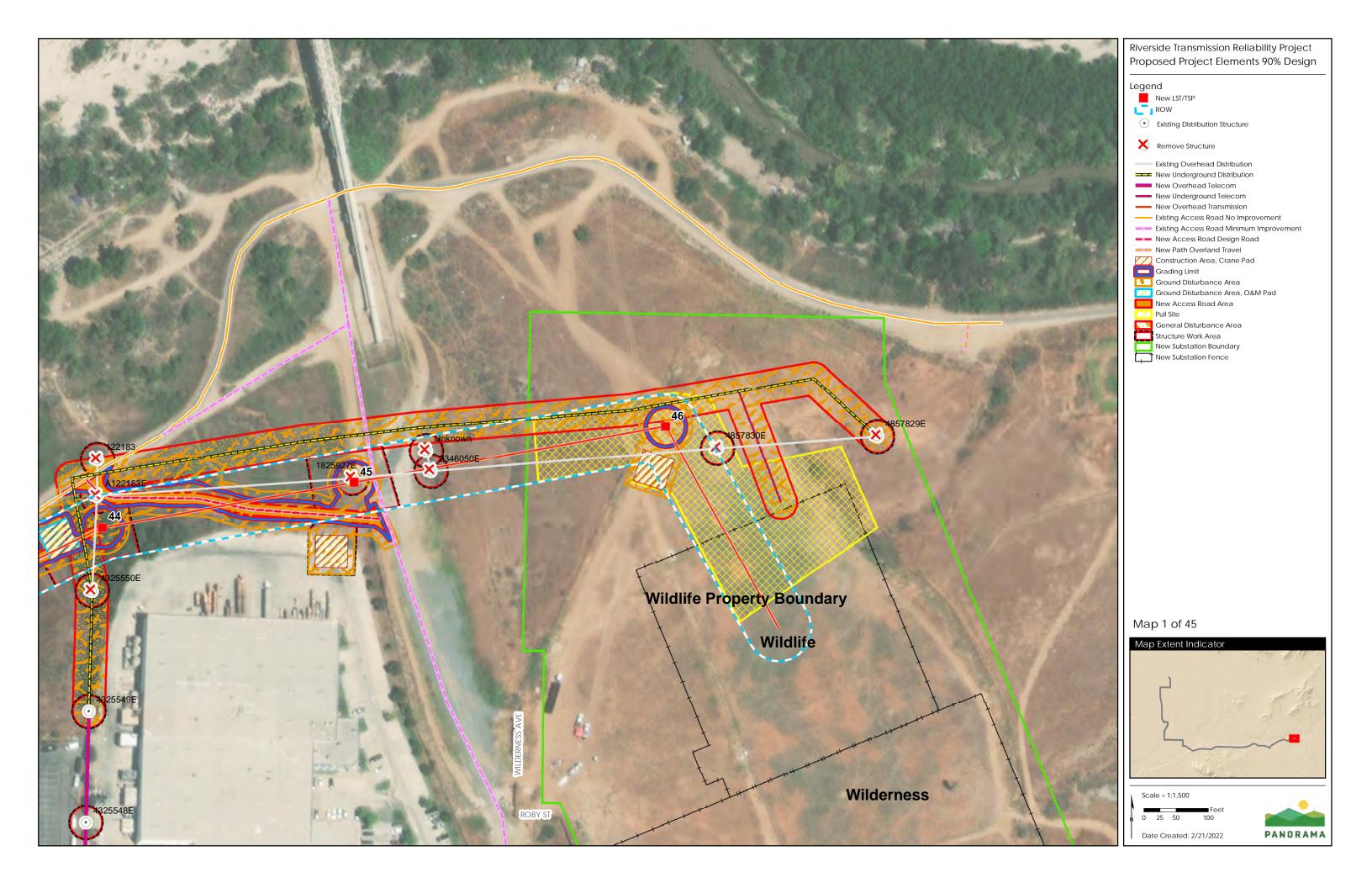
5.1.2 Public Access to Records

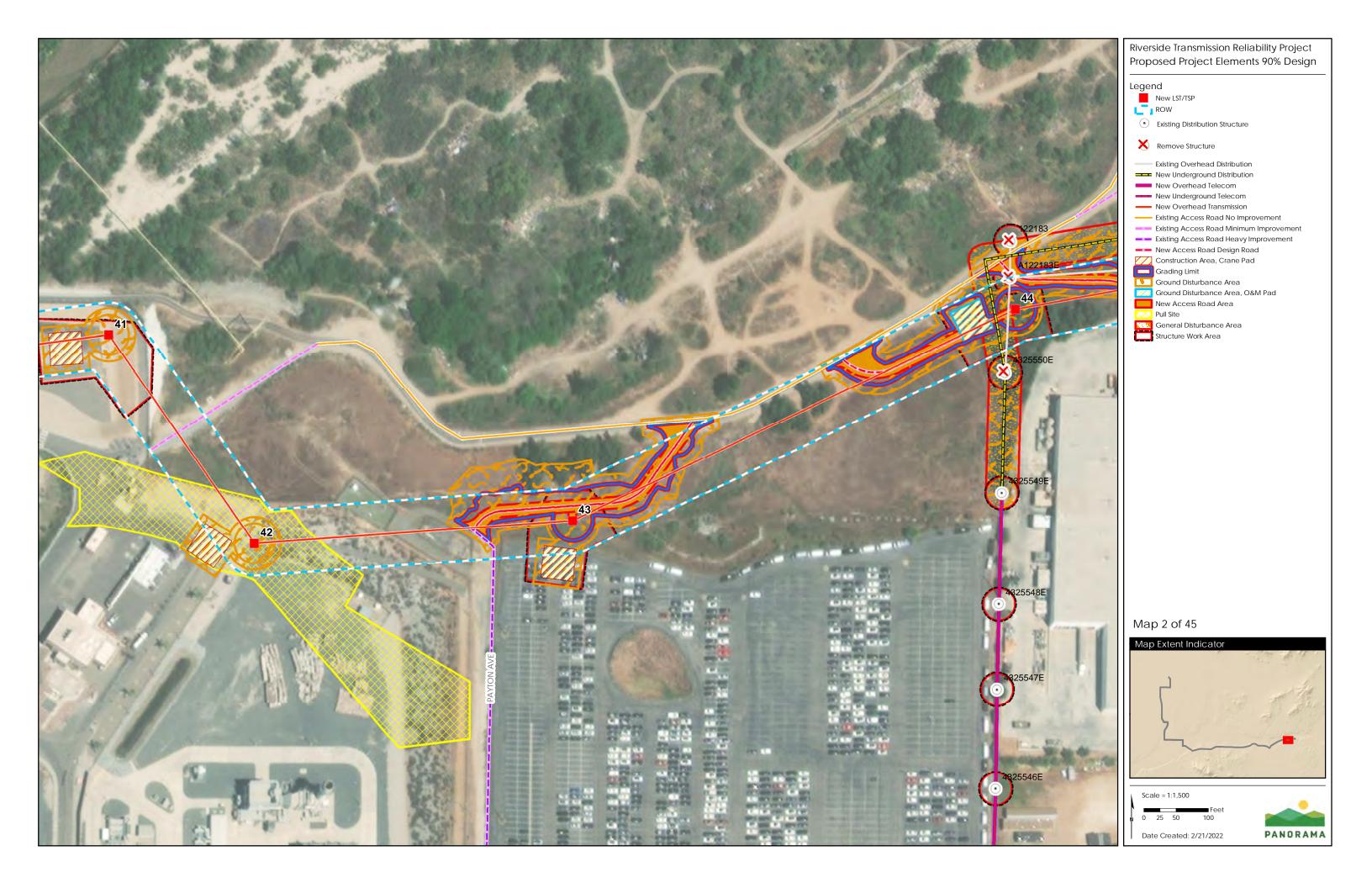
The public is allowed access to records used to monitor and track compliance with project requirements. Such records will be made available to the public upon request unless the records are confidential. In order to facilitate public awareness, the MMCRP will be posted on the project website:

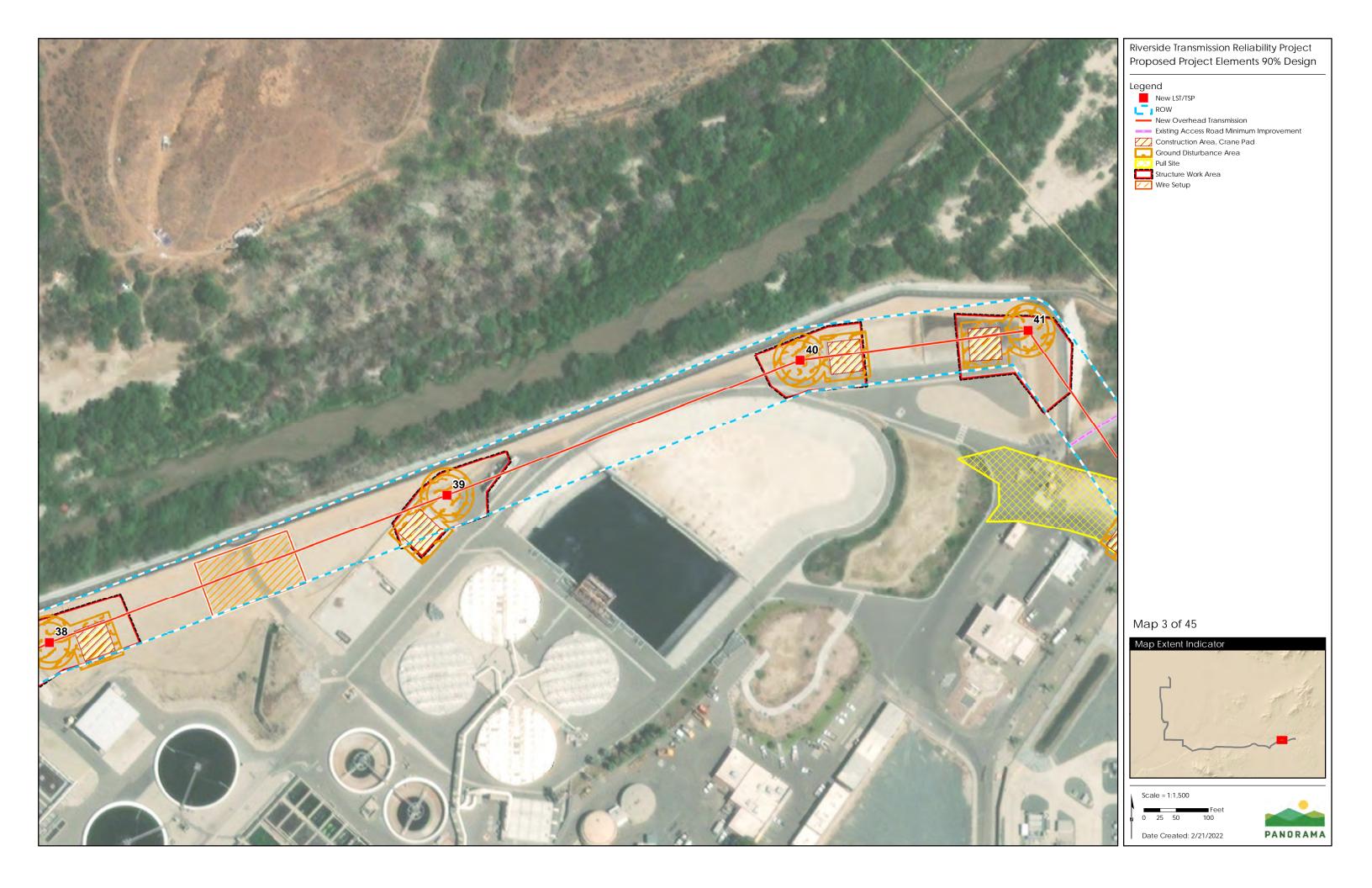
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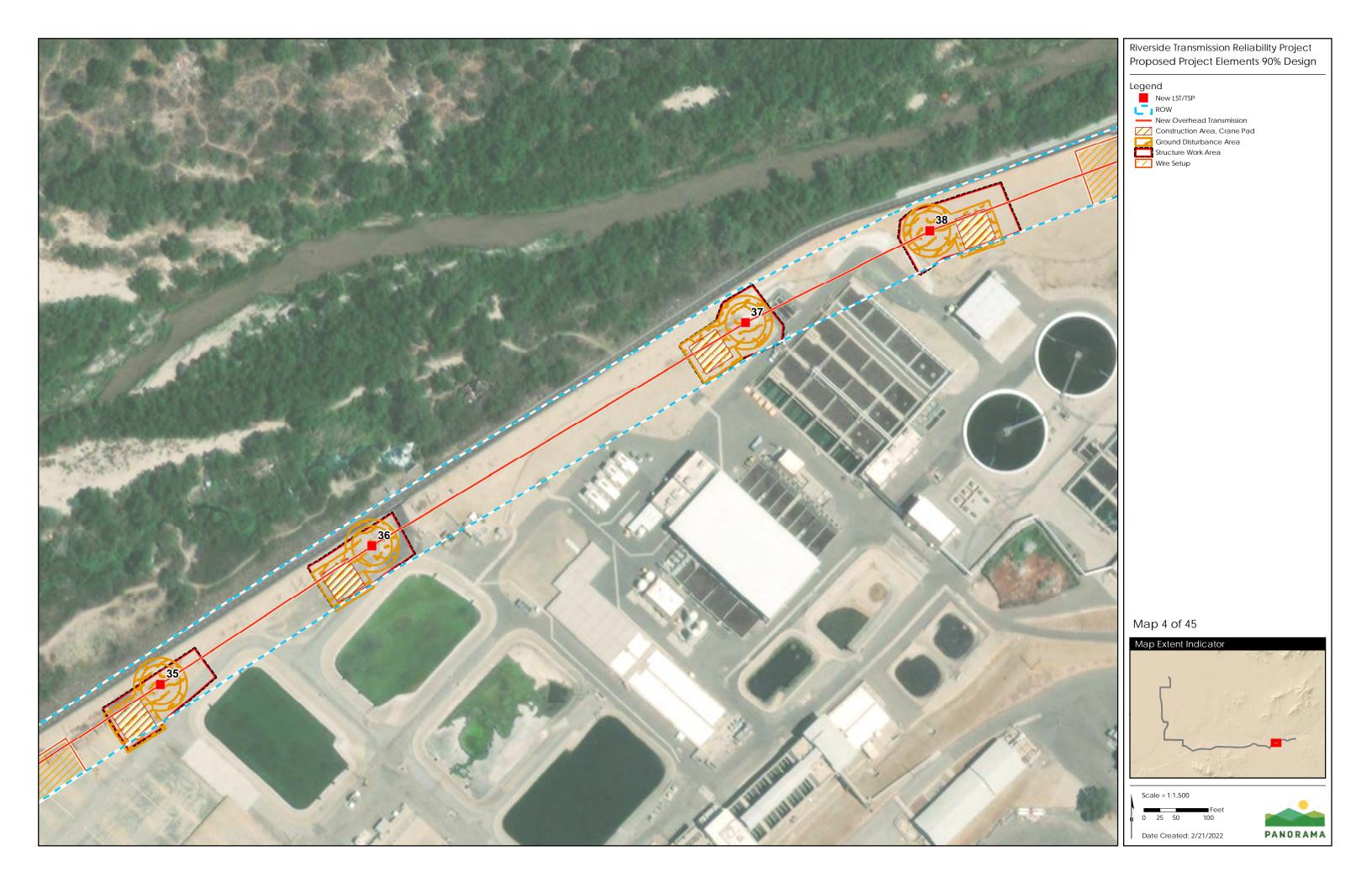
If determined necessary by the CPUC Project Manager, Monthly Monitoring Summary Reports will also be posted on the project website during construction.

Appendix A Project Detail Maps

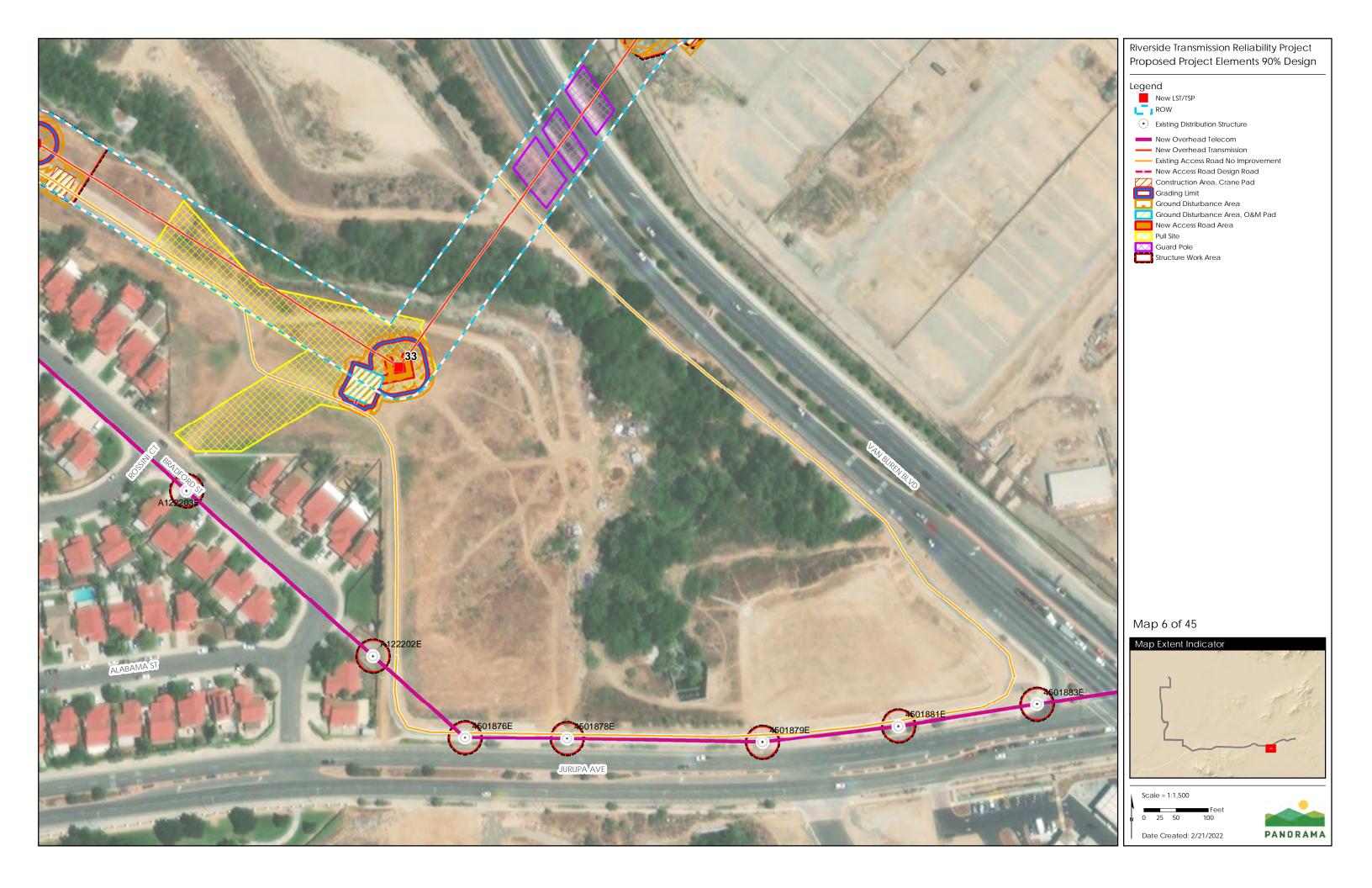


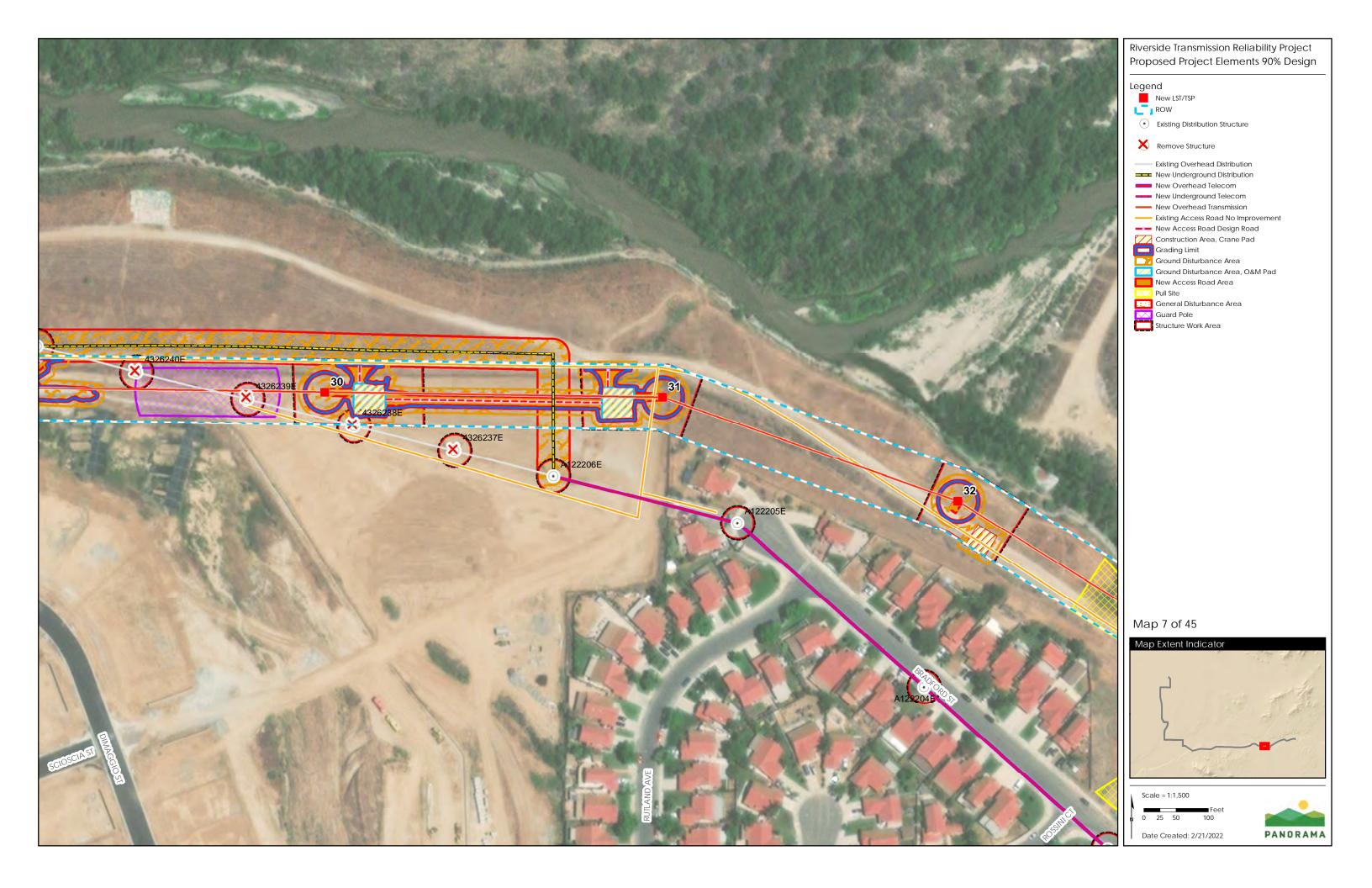


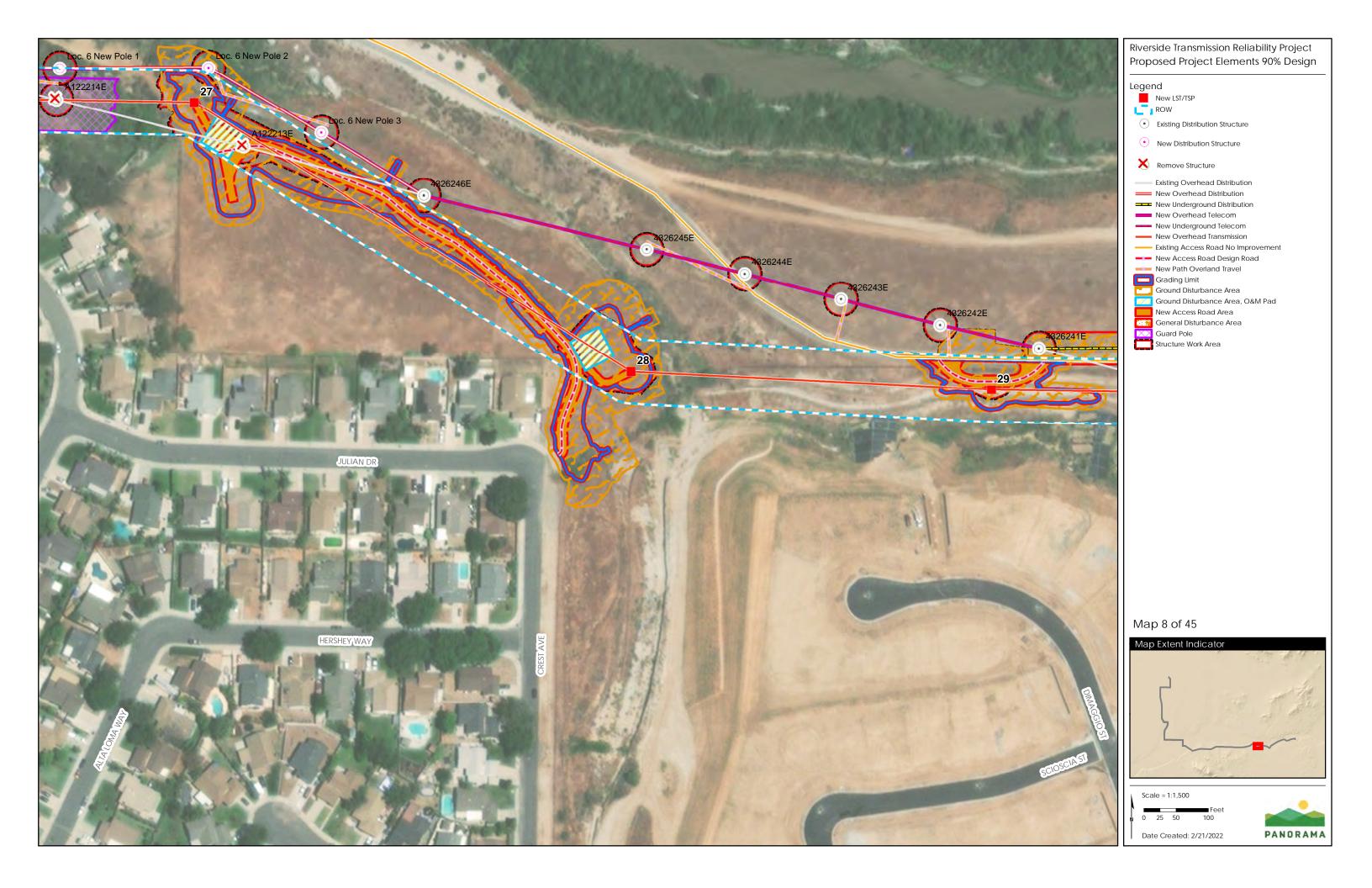


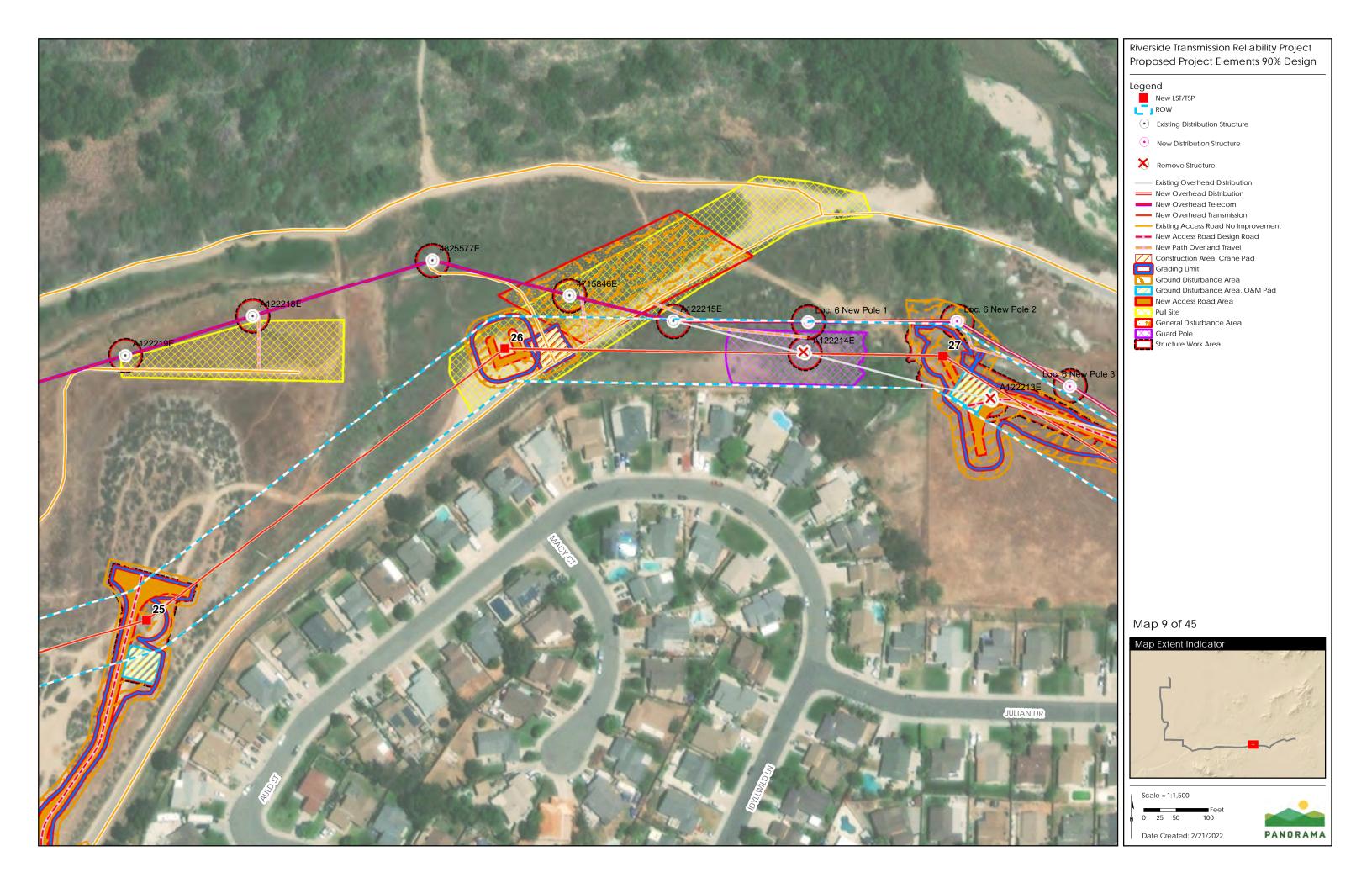


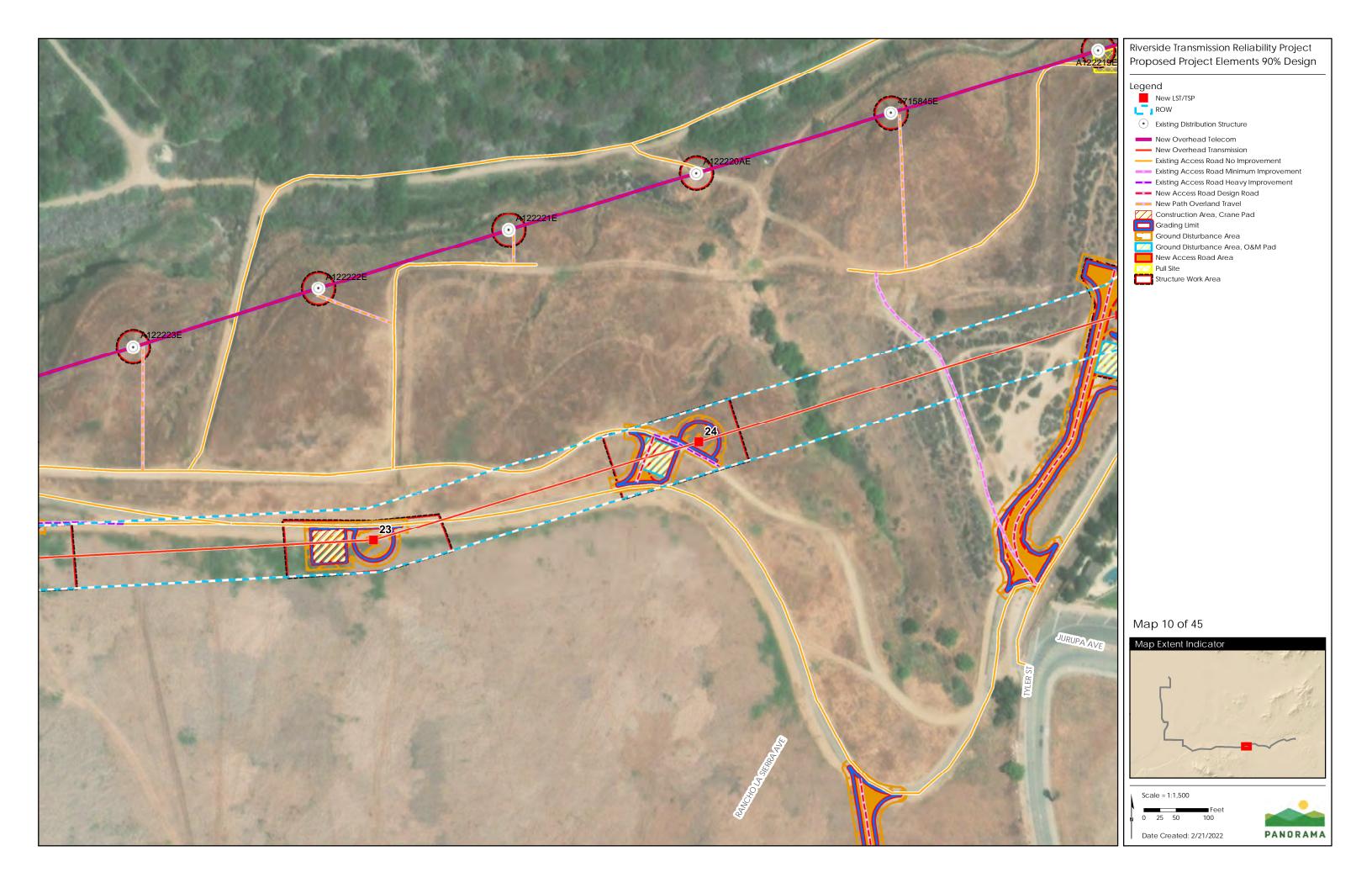




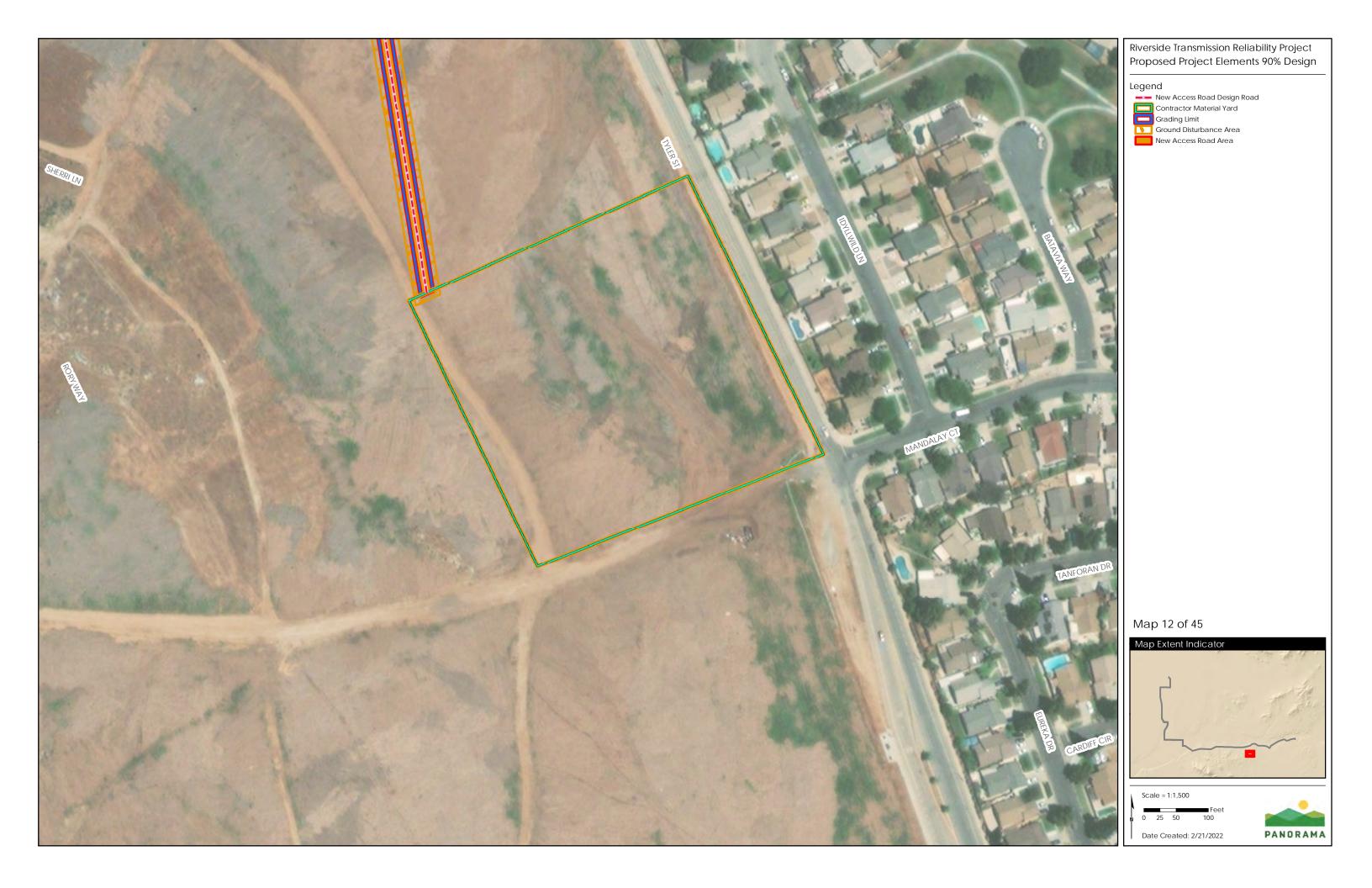


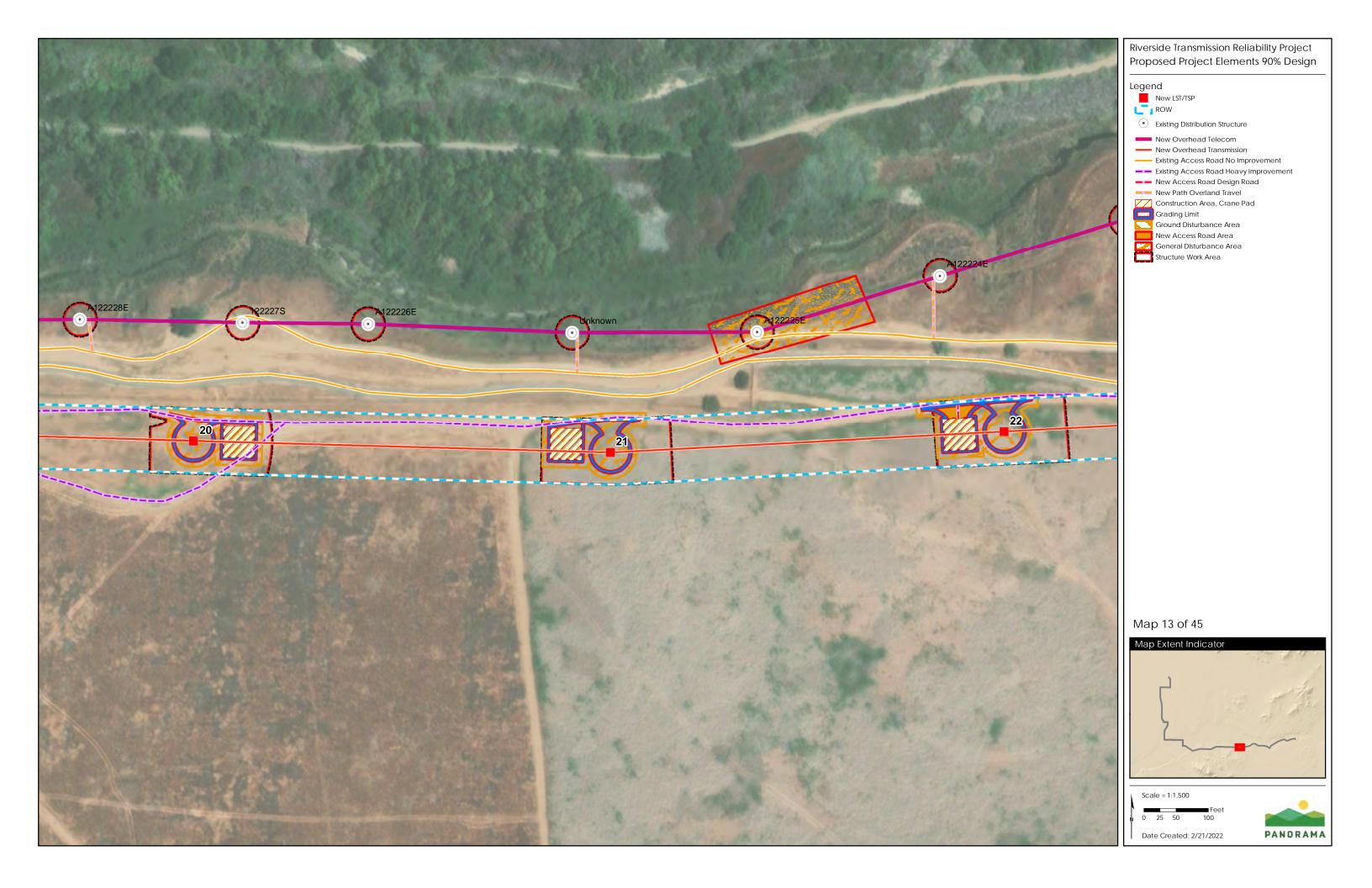


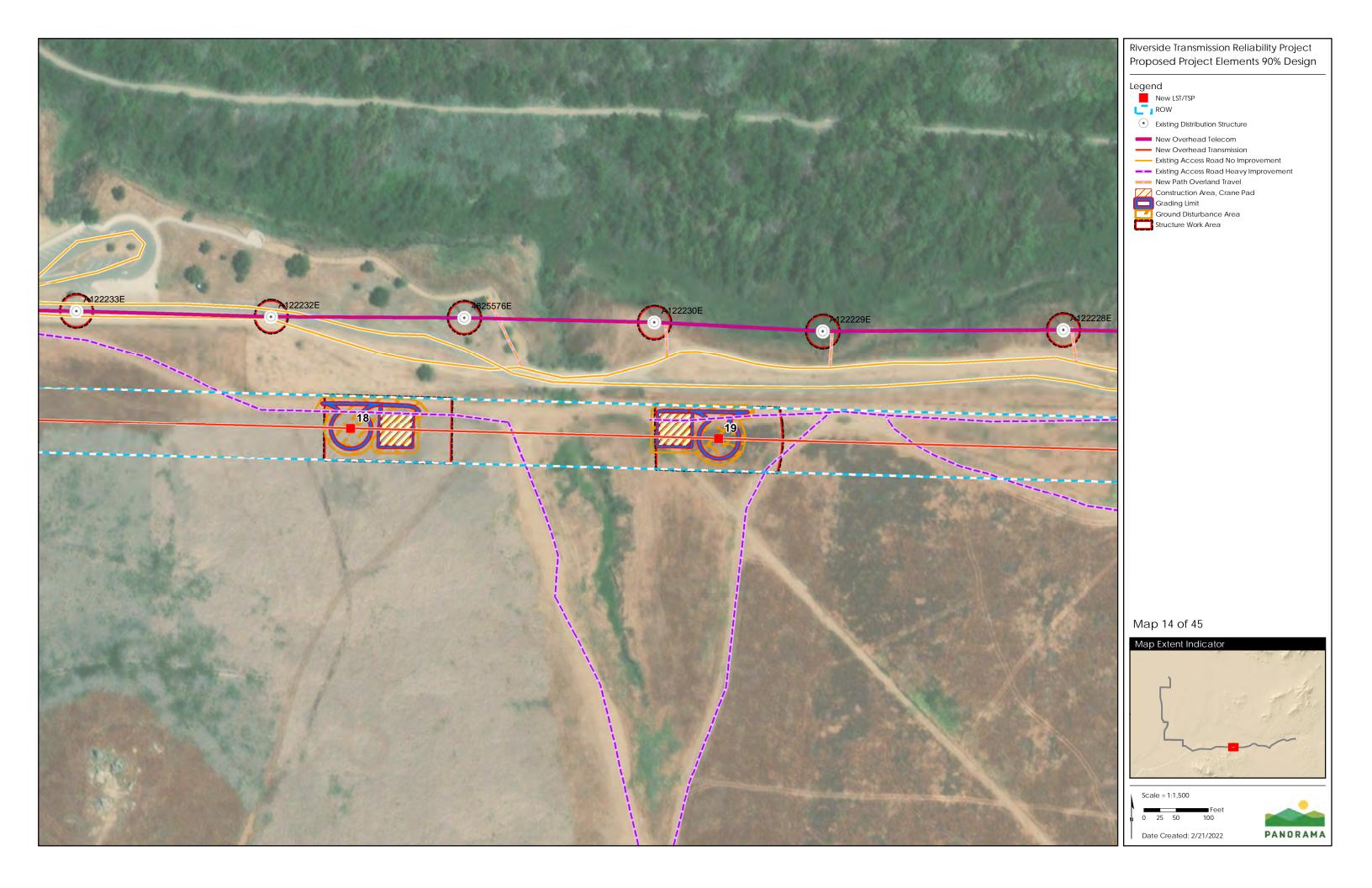


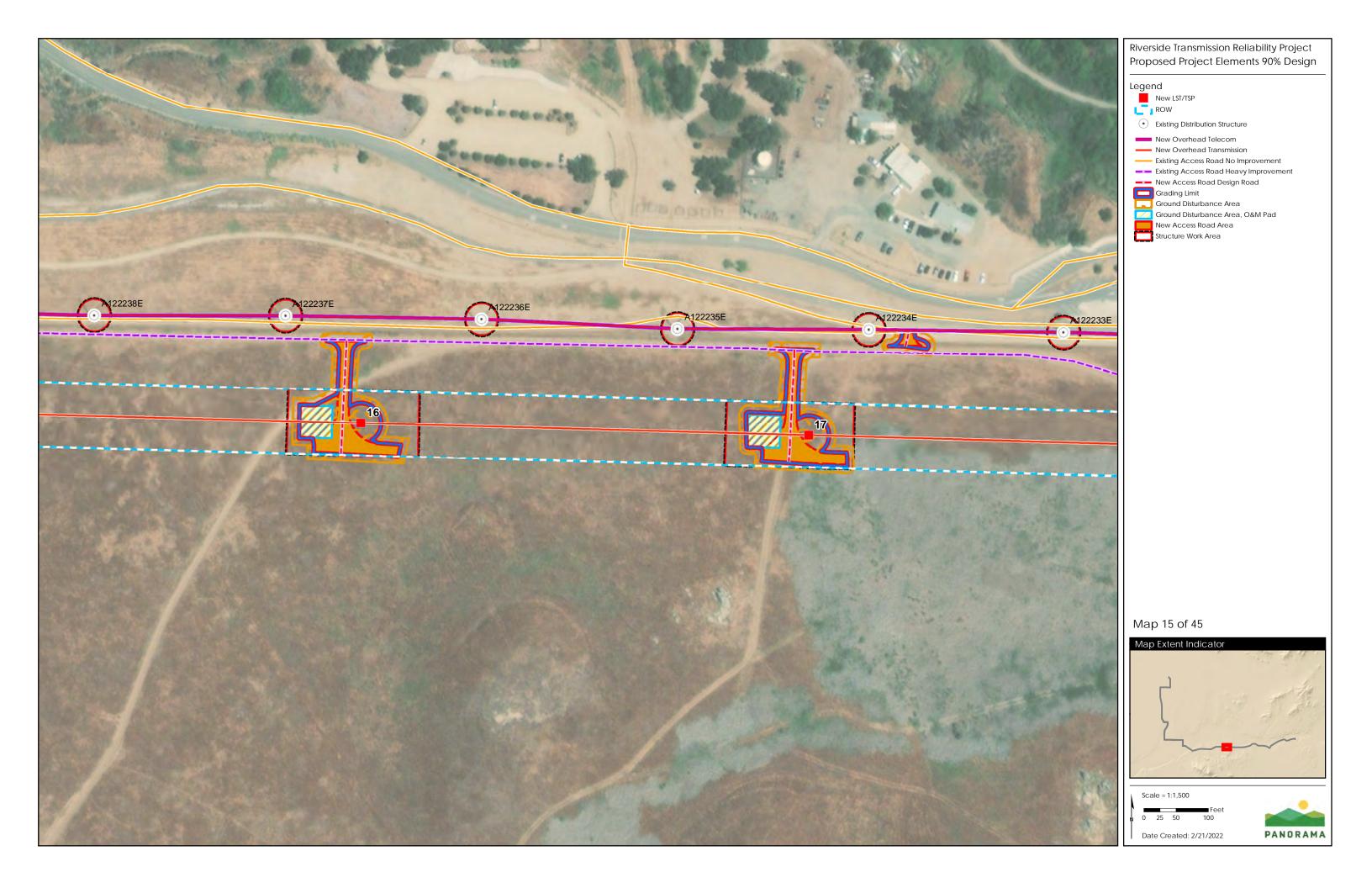


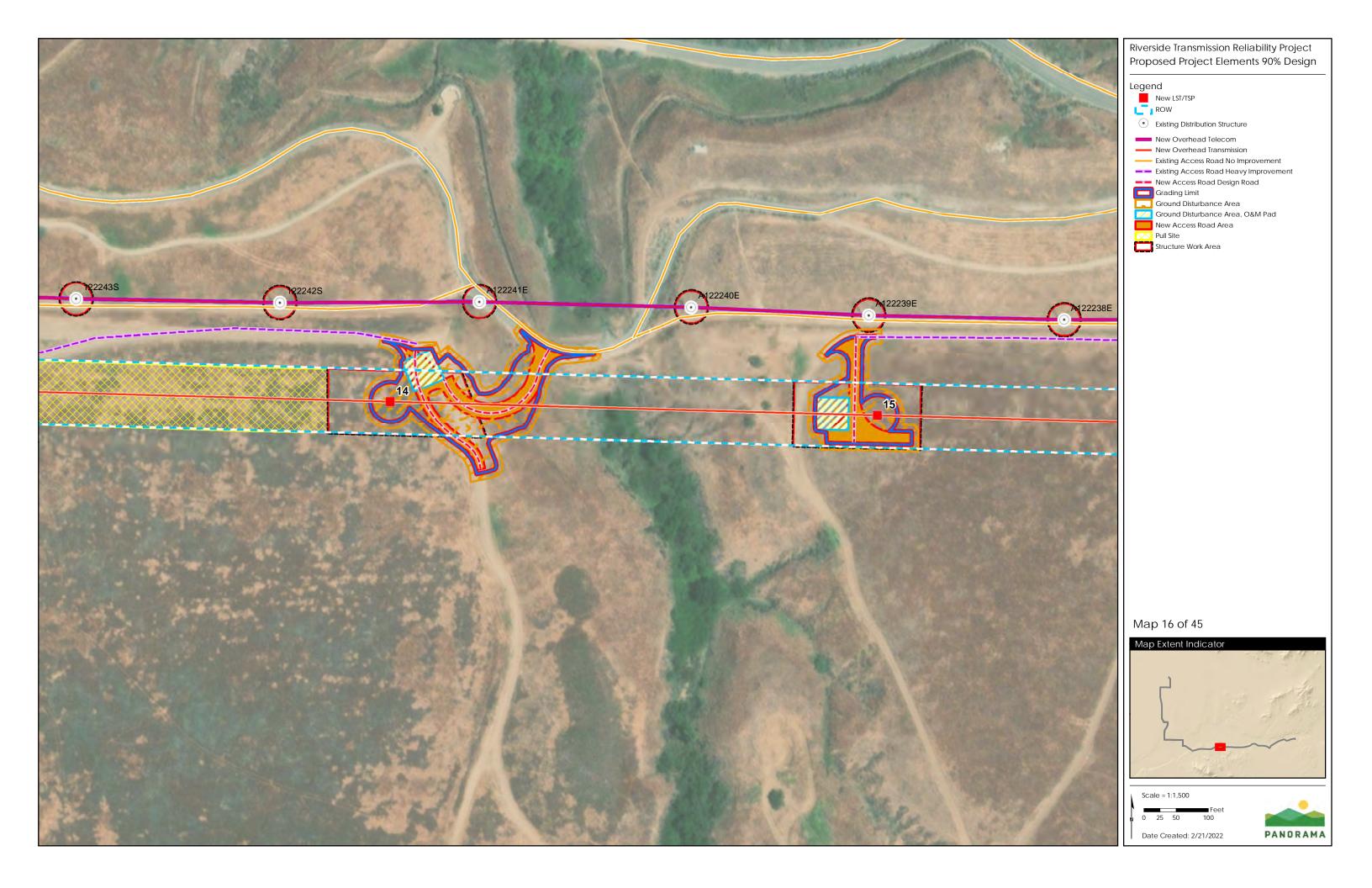


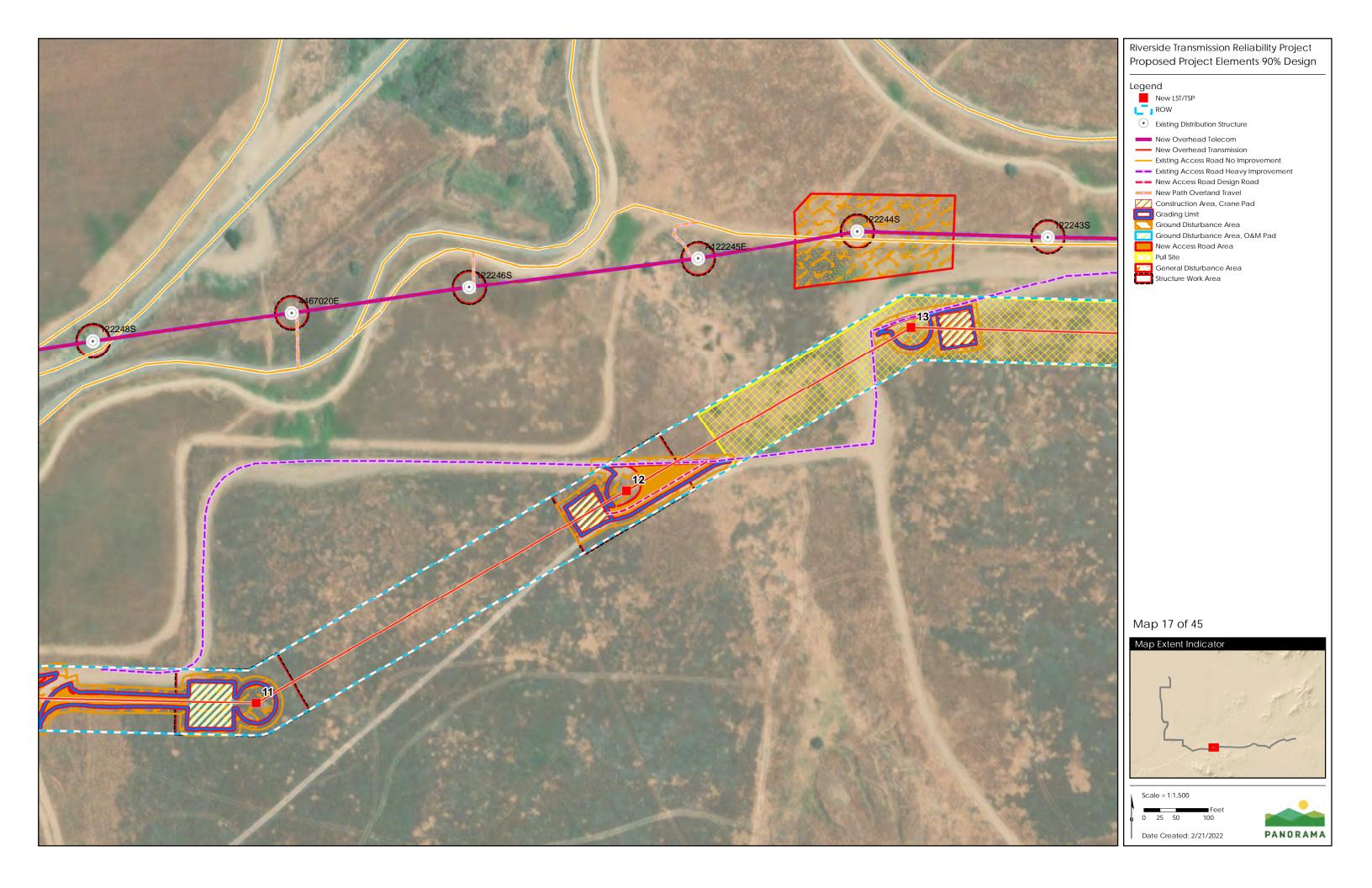






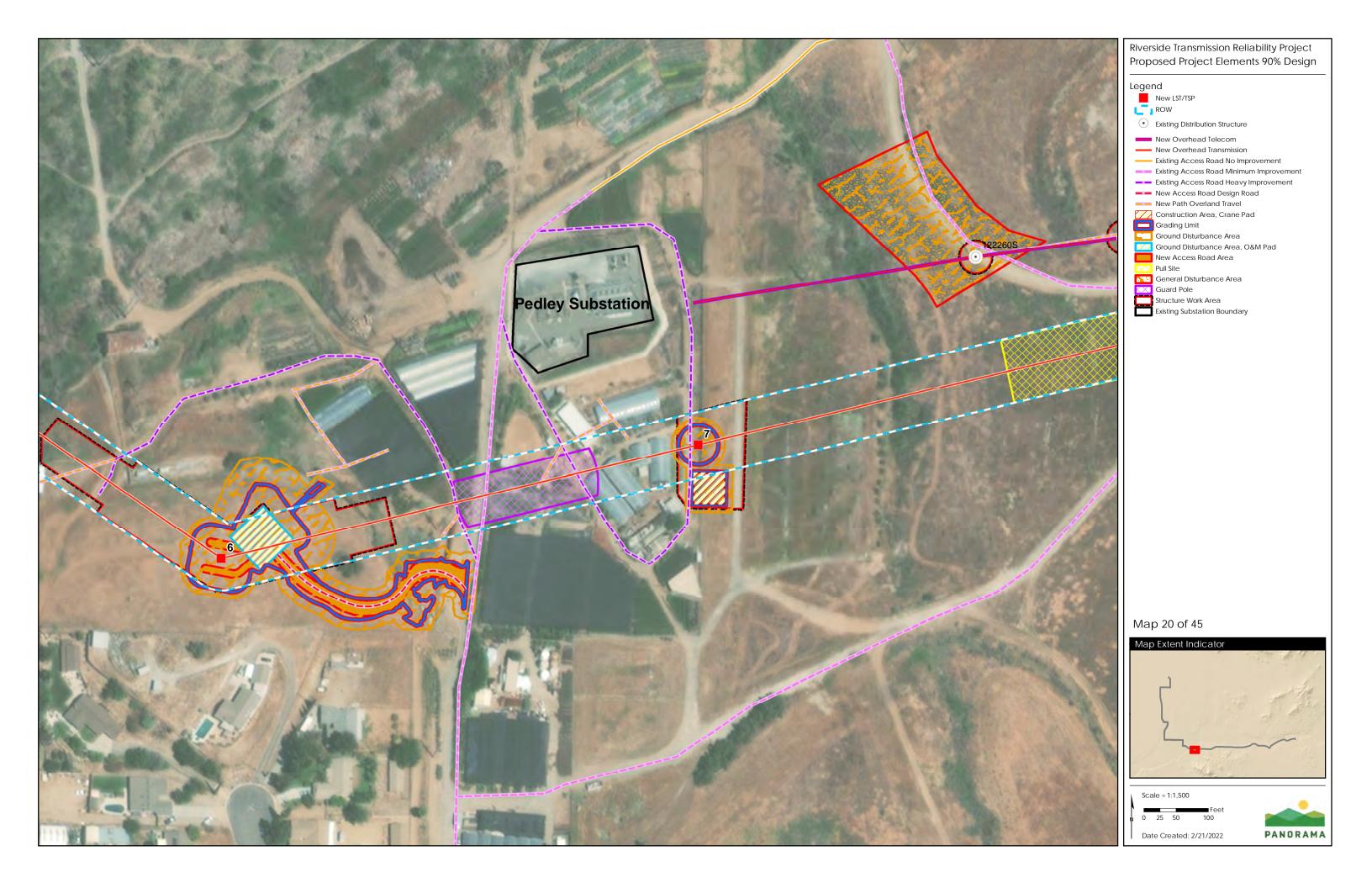




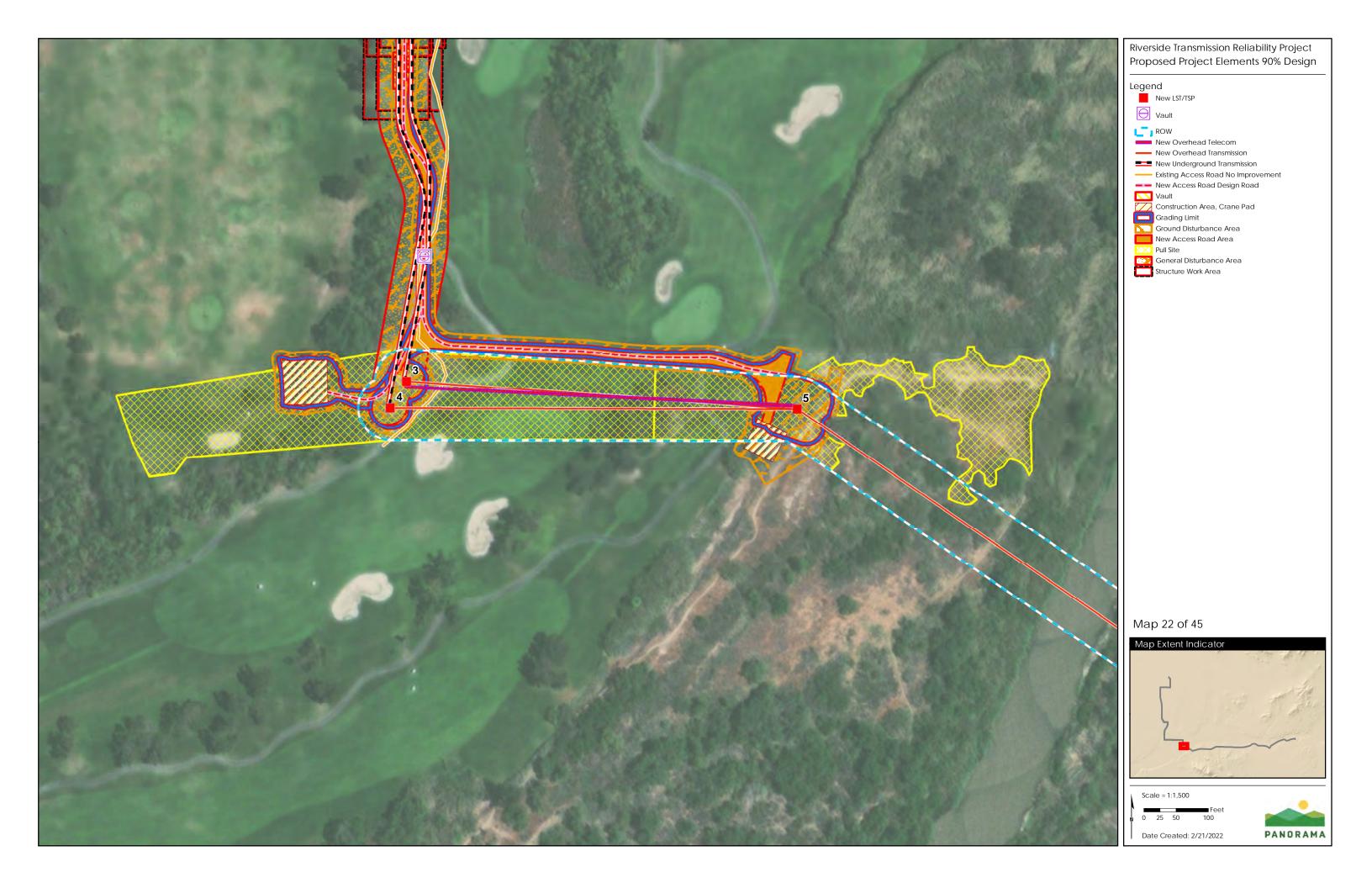






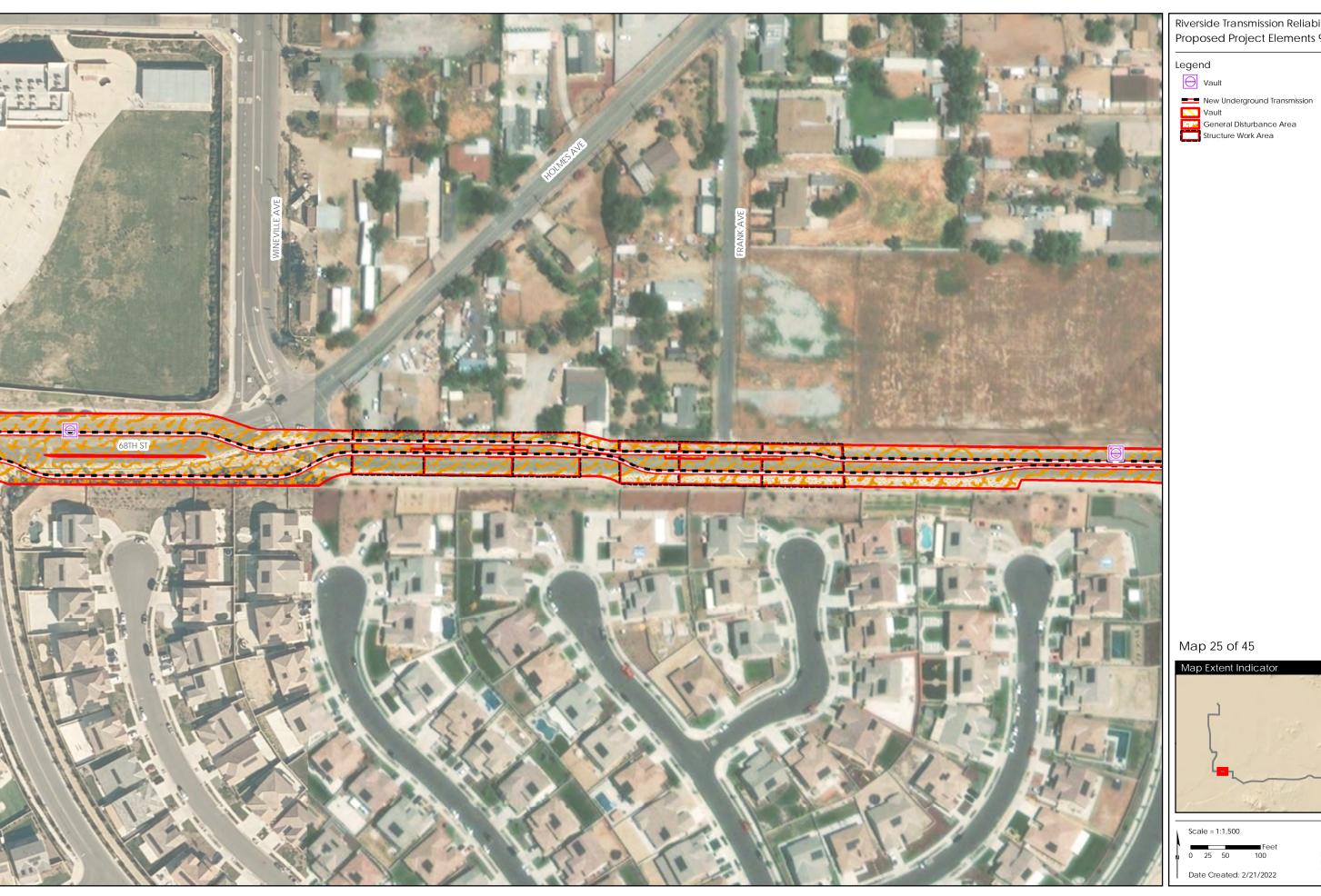




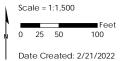




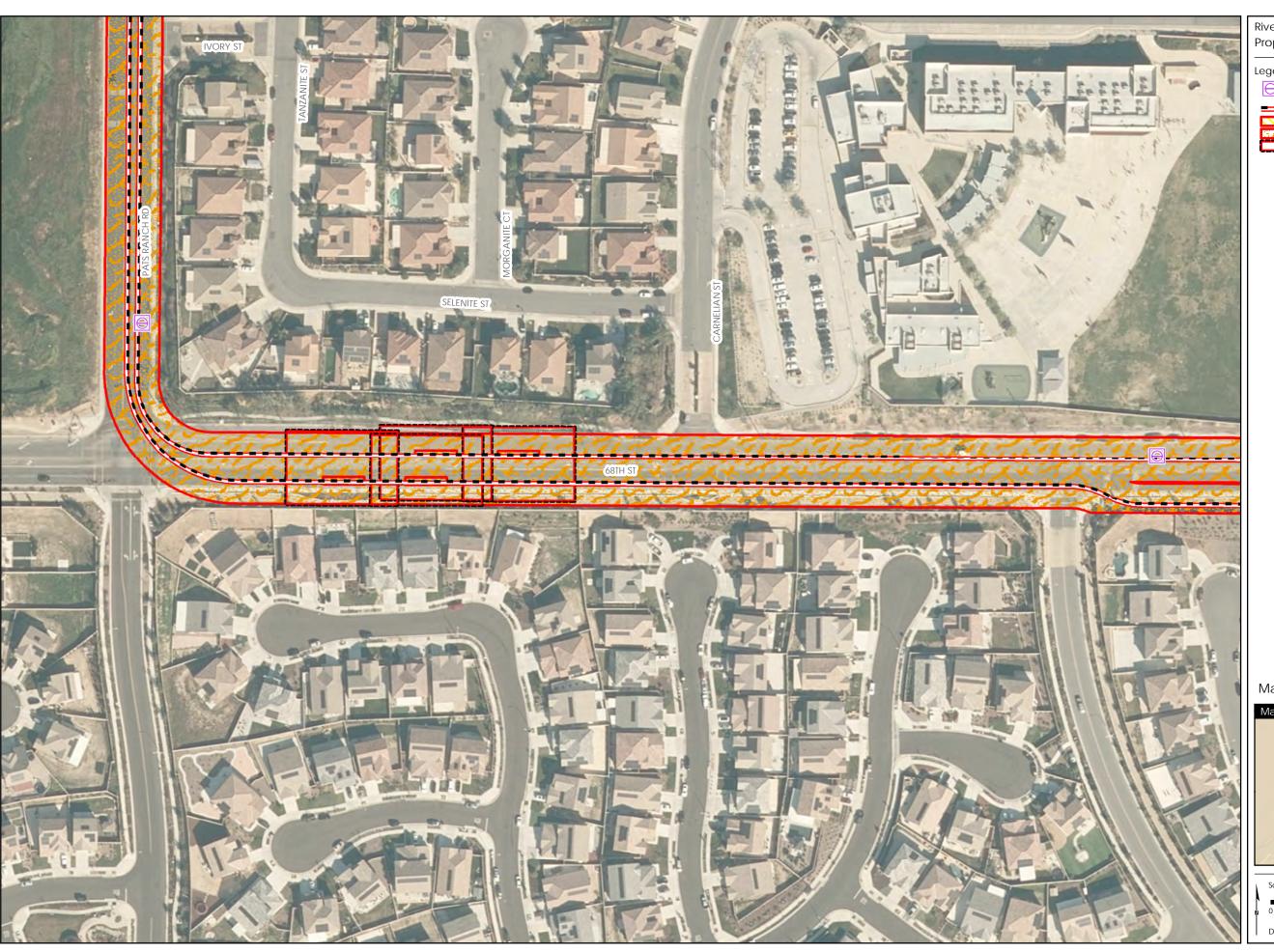












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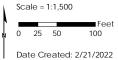


New Underground Transmission
Vault
General Disturbance Area
Structure Work Area



Map 26 of 45









Legend

New Underground Transmission
Vault
General Disturbance Area
Structure Work Area

Map 27 of 45



Date Created: 2/21/2022





Legend



New Underground Transmission
Vault
General Disturbance Area
Structure Work Area

Map 28 of 45











New Underground Transmission
Vault
General Disturbance Area
Structure Work Area

Map 29 of 45



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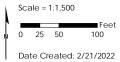
New Underground Transmission



Vault
General Disturbance Area
Structure Work Area

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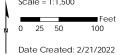
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New Underground Transmission

Vault
General Disturbance Area
Structure Work Area

Map 31 of 45







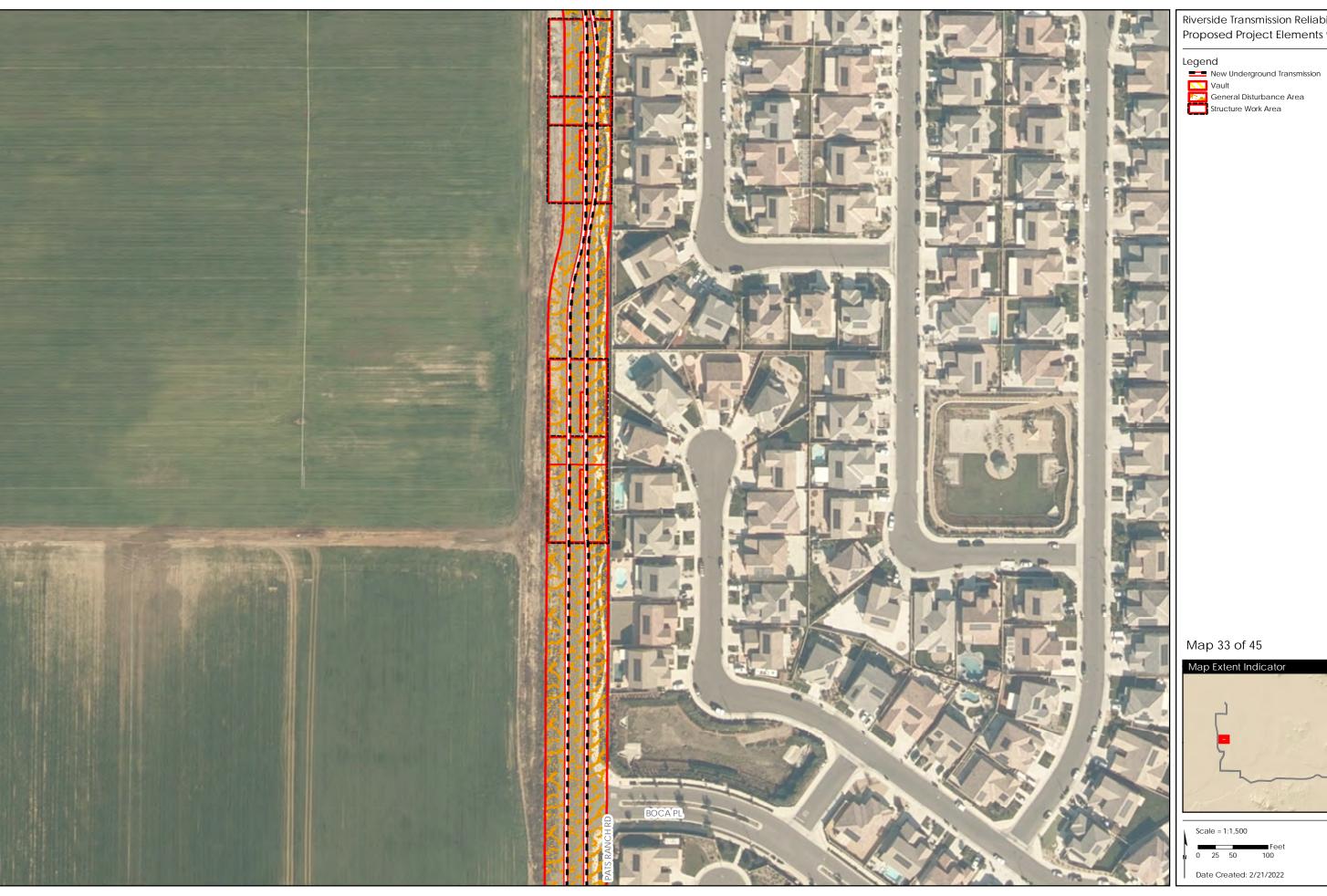


Map 32 of 45







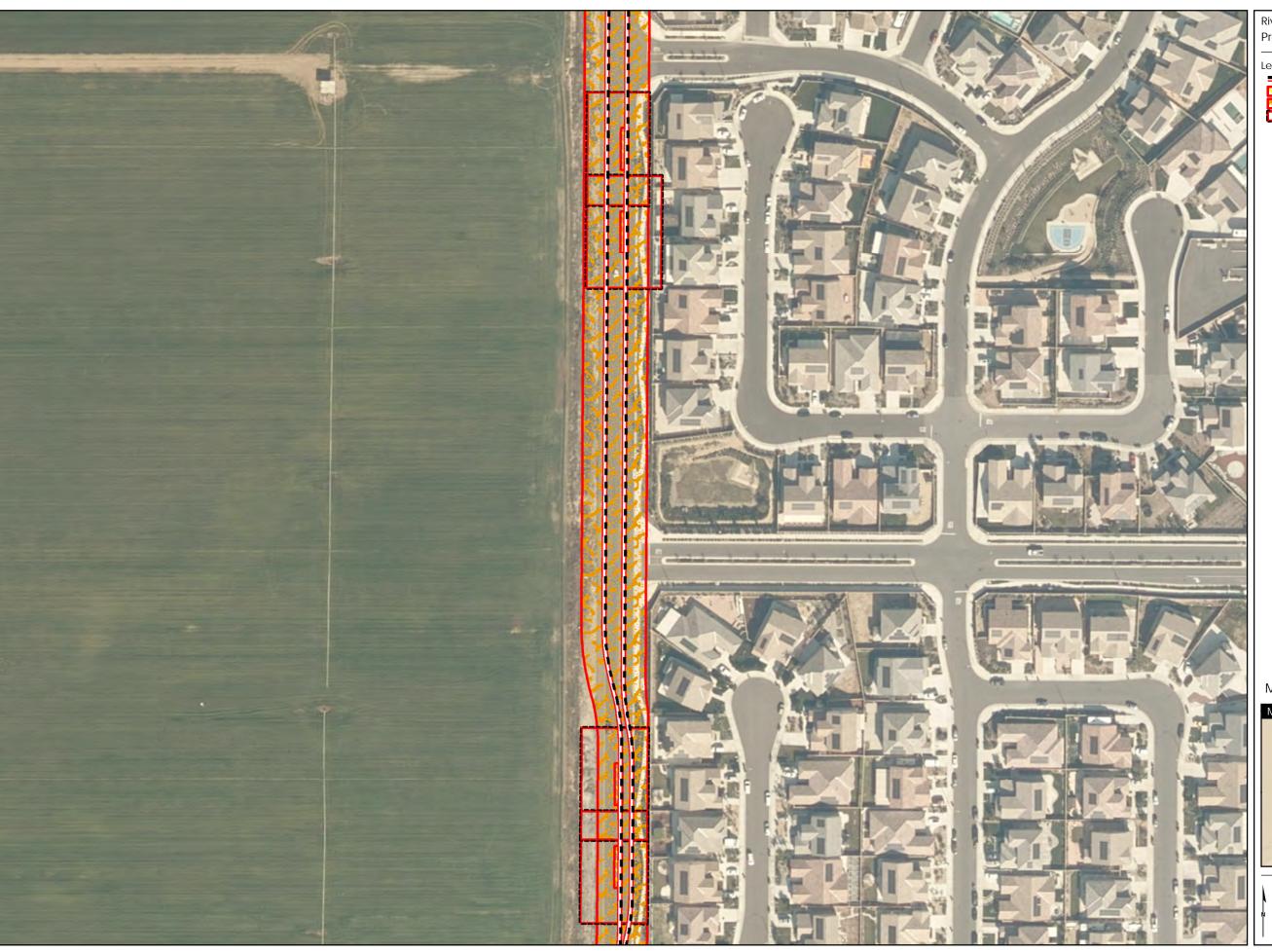


Map 33 of 45





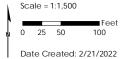
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Legend
New Underground Transmission
Vault
General Disturbance Area
Structure Work Area

Map 34 of 45









Legend
New Underground Transmission
Vault
General Disturbance Area
Structure Work Area



Map 35 of 45









Legend

New Underground Transmission

Vault
General Disturbance Area
Structure Work Area

Map 36 of 45





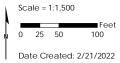




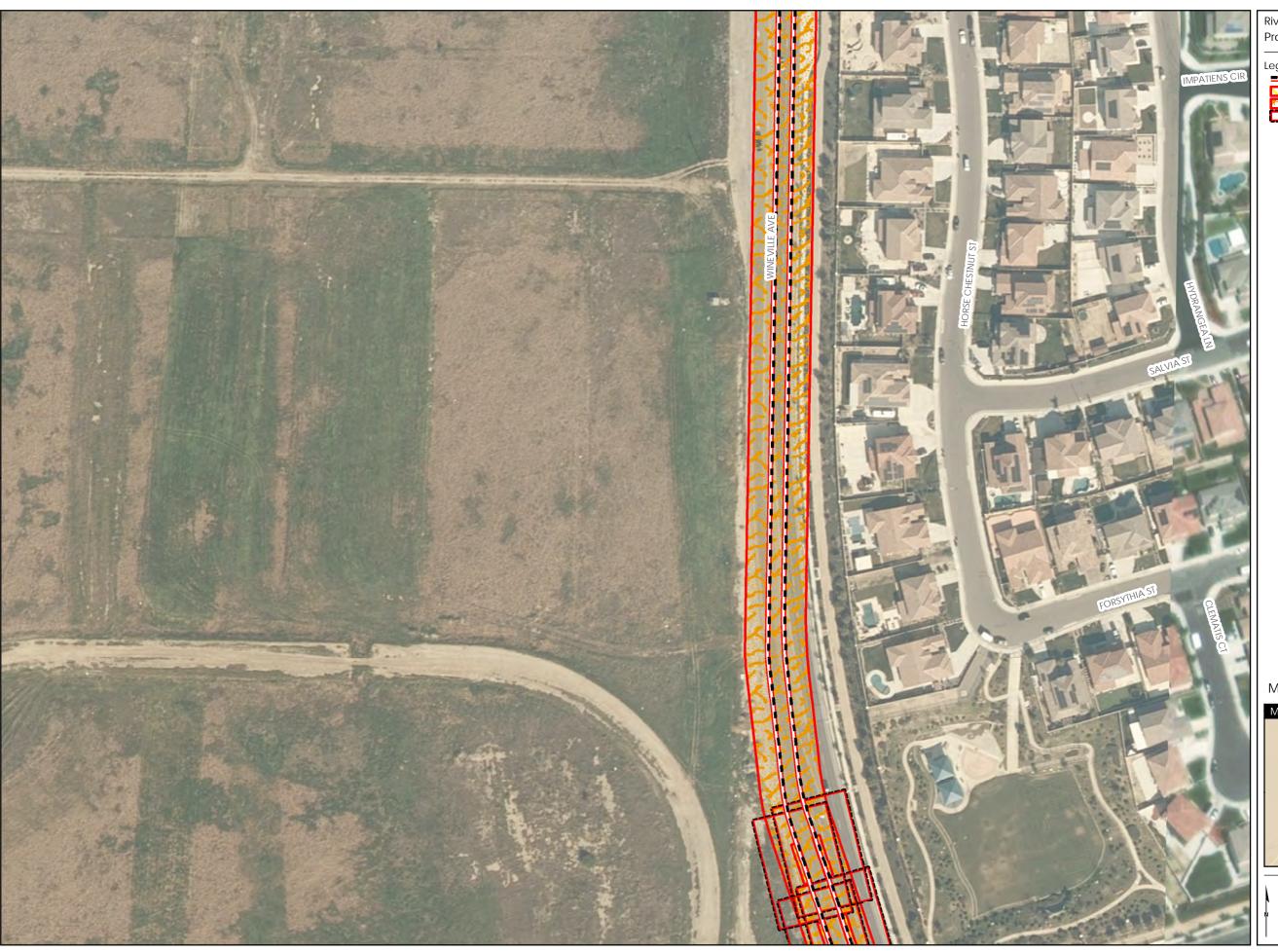
Vault
General Disturbance Area
Structure Work Area

Map 37 of 45









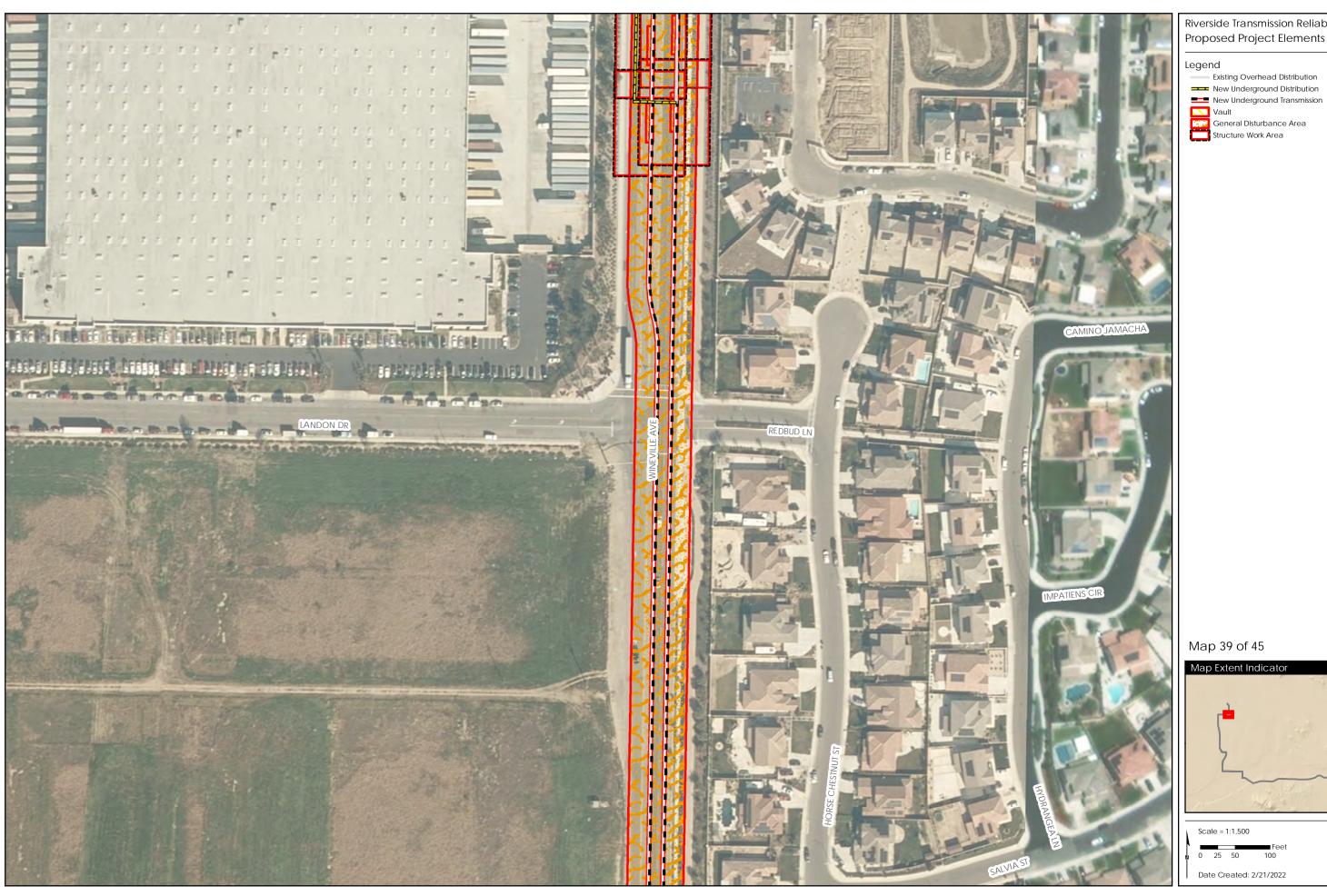
Legend
New Underground Transmission
Vault
General Disturbance Area
Structure Work Area

Map 38 of 45









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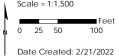
Existing Overhead Distribution

New Underground Distribution

Vault
General Disturbance Area
Structure Work Area

Map 39 of 45









Legend

Existing Overhead Distribution

New Underground Distribution

Vault
General Disturbance Area

Structure Work Area

Map 40 of 45









Existing LST
Existing Overhead Distribution

New Underground Distribution

 Remove Overhead Distribution Existing Overhead Telecom

New Underground Transmission

Map 41 of 45













Legend
Contractor Material Yard

Map 44 of 45







Appendix B Final Environmental Protection Elements and Mitigation Measures

 Table 1
 Final Environmental Protection Elements and Mitigation Measures for Alternative 1

Environmental Protection Element/Mitigation Measure	Performance Standard and Timing	Location
Aesthetics		
EPE AES-01: Transmission Lines: Use Nonreflective/Nonrefractive Transmission Structure. Lattice Steel Towers (LSTs) and Tubular Steel Poles (TSPs) with a dulled galvanized grey finish to minimize reflected light will be used.	 Prior to Construction: Obtain nonreflective/nonrefractive transmission structure During Construction: Install nonreflective/nonrefractive transmission structure Following Construction: N/A 	230-kV Transmission Line
EPE AES-02: Transmission Lines and Substations: Use Nonreflective/Nonrefractive Insulators. Insulators that do not reflect or refract light will be used.	 Prior to Construction: Obtain nonreflective/nonrefractive insulators During Construction: Install nonreflective/nonrefractive transmission insulators Following Construction: N/A 	230-kV Transmission Line. Wildlife & Wilderness Substations, Substation Upgrades
EPE AES-03: Transmission Lines: Use Nonreflective/Nonrefractive Conductors. Conductors that do not reflect or refract light will be used.	 Prior to Construction: Obtain nonreflective/nonrefractive conductors During Construction: Install nonreflective/nonrefractive conductors Following Construction: N/A 	230-kV Transmission Line
EPE AES-04: Substations: Use Low-Reflectivity Structure & Equipment. Substation equipment and structures will have materials that minimize reflective light.	 Prior to Construction: N/A During Construction: Equipment and structures used in the stations will have materials that minimize reflective light Following Construction: N/A 	Wildlife & Wilderness Substations, Substation Upgrades
EPE AES-05 : Substations : Use Hooded, Nonreflective Exterior Light Fixtures/Standards . Exterior light fixtures/standards will be manufactured with hoods and made with nonreflective materials to direct light from spilling off-site as well as skywards while reducing potential effects of glare.	 Prior to Construction: Obtain hooded, nonreflective exterior light fixtures During Construction: Use hooded, nonreflective exterior light fixtures and standards Following Construction: N/A 	Wildlife & Wilderness Substations. Substation Upgrades
EPE AES-06: Placement of Transmission Structures. Transmission structures will be located adjacent to or in proximity of existing electrical infrastructure.	 Prior to Construction: N/A During Construction: Locate transmission lines adjacent to existing electrical infrastructure Following Construction: N/A 	230-kV Transmission Line, 69-kV Subtransmission Lines, Fiber Optic Telecommunications
EPE AES-07: Storage Area Vegetation. Rehabilitate pulling, tensioning, and construction storage areas to original contour and vegetative state.	 Prior to Construction: N/A During Construction: N/A Following Construction: Return pulling, tensioning and construction storage areas to original state 	230-kV Transmission Line, 69-kV Subtransmission Lines, Fiber Optic Telecommunications
 EPE AES-08: Nighttime Construction Lighting. A Construction Safety Lighting Plan will be prepared and implemented and will include but not limited to: Lighting shall be designed so exterior lighting is hooded, with lights directed downward or toward the area to be illuminated and so that backscatter to the nighttime sky is minimized. The design of the lighting shall be such that the luminescence or light sources are shielded to prevent light trespass outside the project boundary. All lighting shall be of minimum necessary brightness consistent with OSHA requirements. 	 Prior to Construction: Prepare Construction Safety Lighting Plan During Construction: Implement Construction Safety Lighting Plan Following Construction: N/A 	230-kV Transmission Line, Wildlife Substation

Environmental Protection Element/Mitigation Measure	Performance Standard and Timing	Location
EPE AES-09: Staging Areas. Staging areas will be kept organized, and litter and debris will be regularly removed on at least a weekly basis.	 Prior to Construction: Staging areas will be kept clean and organized During Construction: Staging areas will be kept clean and organized Following Construction: N/A 	230_kV Transmission Line 69_kV Subtransmission Lines, Wildlife & Wilderness Substations, Substation Upgrades, Fiber Optic Telecommunications
MM AES-01: Restore Construction Impacts to Vegetation. SCE shall conduct a pre-construction site assessment of all locations where Project construction activities have the potential to disturb existing vegetation, including native and landscaped vegetation. The pre-construction site assessment and proposed revegetation activities shall be documented in a Pre-Activity Study Report and shall include the following: Description of work location, size, equipment, and methods required for project activities that may disturb vegetation Map of work area location Documentation of surrounding land uses Photographs of the area to be disturbed Documentation of vegetation types, species, and quantity to be removed Proposed landscape revegetation plans Records of communication with landowners indicating approval of revegetation plans The Pre-Activity Study Report shall be submitted to CPUC for review and approval no fewer than 30 days prior to the start of construction. When Project construction has been completed, all temporarily disturbed terrain will be restored, to the extent practical, to pre-construction conditions documented in the Pre-Activity Study Report while maintaining adequately safe work areas for operation and maintenance activities, as needed. Planting will be used, where appropriate (re-vegetation in certain areas is not possible due to vegetation management requirements related to fire safety) to re-establish a vegetated landscape and reduce potential visual contrast between disturbed areas and the surrounding landscape. Temporarily disturbed non-native vegetation shall be restored with native vegetation. Documentation of completed revegetation activities, including planting container stock or seeding, shall be submitted to the CPUC for final approval no later than 30 days after project completion.	 Prior to Construction: SCE completes pre-construction site assessment and submits a Pre-Activity Study Report to CPUC for review and approval no fewer than 30 days prior to the start of construction During Construction: N/A Following Construction: Restore impacts on vegetation and provide documentation of completed revegetation to CPUC for final approval within 30 days of project completion 	All Project locations included in the CPCN where vegetation or landscaping has been disturbed by construction purposes
Agriculture and Forestry Resources		
 EPE AGR-01: Minimize Impacts to Active Agricultural Operations. Transmission structures would be located adjacent to existing electrical infrastructure to consolidate any potential obstructions to the movement of agricultural machinery Access roads, spur roads, staging areas, and pulling/splicing sites would be located in areas that minimize impacts to agricultural operations Removal of perennial crops would be minimized 	 Prior to Construction: Minimize impacts to active agricultural operations During Construction: Minimize impacts to active agricultural operations Following Construction: N/A 	Transmission Structures Access Roads, Spur Roads, Staging Areas, Pulling/Splicing Sites
No MMS		
Air Quality		
EPE AQ-01: Comply with SCAQMD Requirements. The construction activities shall comply with the South Coast Air Quality Management District (SCAQMD) requirements, as applicable to the project.	 Prior to Construction: N/A During Construction: Comply with SCAQMD requirements Following Construction: N/A 	Active construction area
EPE AQ-02: Worker Environmental Awareness Program. A general Air Quality WEAP would be prepared. All construction crews and contractors would be required o participate in this WEAP training prior to starting work on the project. The air quality WEAP may be combined with the general WEAP for sensitive species as described under mitigation measure BIO-05.	 Prior to Construction: Prepare a WEAP. All construction personnel receive training prior to construction. During Construction: All construction personnel receive training prior to entering active construction sites. Following Construction: N/A 	Active construction area

Environmental Protection Element/Mitigation Measure

MM AQ-01: Fugitive Dust Control Plan (Incorporates 2013 RTRP EIR MMs AQ-07 thru AQ-13 and AQ-18). Prior to start of the initial on-site construction, a draft Fugitive Dust Control Plan shall be prepared in compliance with SCAQMD Rule 403. Fugitive dust shall be controlled by the applicable best available control measures listed in Table 1 of Rule 403. A draft Fugitive Dust Control Plan shall be submitted to the CPUC for review and approval at least 30 days prior to the initiation of construction.

Under SCAQMD Rule 403 – Fugitive Dust, the following provisions apply:

- The project applicant shall submit a Rule 403 Large Operation Notification to the Executive Officer.
- A sign shall be posted near the entrance of the facility with a responsible individual's name and phone number in case there are any fugitive dust control issues at the site.
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity, including resolution of issues related to PM₁₀ generation from combustion emissions and fugitive dust generation.
- An on-site supervisor with a current fugitive dust control class certification shall be present who is available within 30 minutes to respond to any fugitive dust control issue at the site during normal business hours.
- The operation shall keep on-site records of specific dust control actions taken.

At a minimum, the Fugitive Dust Control Plan shall include the following control measures that must be implemented during construction:

- Limit vehicle speeds to 15 mph on unpaved surfaces.
- Track-out shall not extend 25 feet or more from an active operation and track-out shall be removed at the conclusion of each workday. The contractor shall use
 a gravel apron, 25 feet long by road width, or a pipe-grid track-out control device to reduce mud/dirt track-out from active operations and unpaved truck exit
 routes.
- The construction contractor shall use street sweepers (using reclaimed water) that comply with SCAQMD Rules 1186 and 1186.1.1 The street sweepers shall operate for the length of the truck route to and from unpaved construction areas including the marshalling yards and in between construction sites.
- A wheel washing system shall be installed and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the unpaved construction site.
- Operations on unpaved surfaces shall be suspended when winds exceed 25 miles per hour. When wind speeds are high enough to result in dust emissions crossing the work boundary, despite the application of dust mitigation measures, grading and earthmoving operations shall be suspended.
- Visible dust plumes shall not occur during periods when soil is being disturbed by equipment or by wind at any time. If dust plumes are visible or a dust complaint is lodged, dust control may be achieved by applying water before/during earthwork and onto unpaved traffic areas, phasing work to limit dust, and setting up wind fences to limit wind-blown dust.
- Exposed Surfaces
 - Water or a stabilizing agent shall be applied to exposed surfaces, including graded and disturbed areas, at least three times daily, preferably in the midmorning, afternoon, and after work is finished for the day. Dust control shall be applied in sufficient quantity to prevent generation of dust plumes.
 - Soil stabilization shall be conducted at construction sites after normal working hours, on weekends, and holidays. This requirement also applies to inactive construction areas such as phased projects where disturbed land is left unattended. Applying water to form a visible crust on the soil and restricting vehicle access are often effective for short-term stabilization of disturbed surface areas. Long-term methods include applying dust suppressants and establishing vegetative cover. Stabilization best management practices used for disturbed areas not supporting construction traffic or active work may also include vegetation, plastic covering, erosion control fabrics and matting, and the early application of a gravel base on areas to be paved.
- Stock Piles
 - On-site soil stock piles shall be covered or watered at least twice per day. Water excavated soil piles hourly or cover with temporary coverings. All storage piles shall be covered overnight and during inactivity.
- Haul Trucks
 - Moisten excavated soil prior to loading on haul trucks. Cover all loads of dirt leaving the site or leave at least two feet of freeboard capacity in haul truck to reduce fugitive dust emissions while in-route to disposal site.

Performance Standard and Timing

All Proposed Project locations

Location

- Prior to Construction: (1) SCE submits the draft Fugitive Dust Control Plan to CPUC for review and approval at least 30 days prior to construction, (2) submit a Rule 403 Large Operation Notification to SCAQMD with copy provided to CPUC for verification
- During Construction: SCE implements the Fugitive Dust Control Plan
- Following Construction: N/A

Environmental Protection Element/Mitigation Measure	Performance Standard and Timing	Location
MM AQ-02: Exhaust Emissions Control (Incorporates 2013 RTRP EIR MMs AQ-01 thru AQ-06, AQ-15 thru AQ-17, and AQ-19). Exhaust emissions from worker vehicles, construction equipment, and vehicles shall be minimized by implementing the following control measures: Use ultra-low sulfur diesel fuel (e.g., <15 ppm). Use clean-burning on- and off-road diesel engines. Heavy-duty diesel-powered construction equipment manufactured after 1996 (with federally mandated "clean" diesel engines) shall be utilized. SCE or its contractor shall develop a program and require construction workers to carpool to construction sites. Restrict construction vehicle idling time to less than 5 minutes. Properly maintain mechanical equipment. Use particle traps and other appropriate controls to reduce diesel particulate matter. Other control equipment includes devices such as specialized catalytic converters (oxidation catalysts) control approximately 20 percent of diesel particulate matter, 40 percent of carbon monoxide, and 50 percent of hydrocarbon emissions. Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site. Define construction traffic routes to direct construction trucks and equipment on- and off-site. Define construction traffic routes to direct construction trucks away from congested streets or sensitive receptor areas. During Project construction, all off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations (i.e., if Project construction goes beyond the anticipated schedule). — Alternatively, SCE or the contractor may be allowed to operate off-road equipment that	 Prior to Construction: SCE shall submit calculation evidence to the CPUC for review at least 2 weeks prior to use of off-road equipment that does not meet Tier 4 emissions standards, as needed During Construction: (1) SCE implements all exhaust emission control measures, (2) Provide copies of documentation proving that construction equipment and vehicles meet USEPA-Certified Tier 4 emissions standards, are outfitted with BACT devices, and comply with the Truck and Bus Regulation to the CPUC as equipment is mobilized Following Construction: N/A 	All Proposed Project locations
MM AQ-03: Overlap of Construction Activities (Incorporates 2013 RTRP EIR MM AQ-14). The final project construction schedule shall be coordinated to ensure that the Conductor Installation activity shall not occur simultaneously with the TSP Foundation Installation and TSP Erection activities. Furthermore, air pollutant emissions generated during_construction of SCE project components shall be calculated with those from construction of the RPU components of the RTRP to determine which components can overlap without exceeding the peak daily SCAQMD significance thresholds. The final construction schedule and calculation evidence that the overlapping RTRP components do not exceed SCAQMD significance thresholds_shall be provided to the CPUC at least 2 weeks prior to construction.	 Prior to Construction: SCE shall submit a final construction schedule to the CPUC for review at least two weeks prior to construction During Construction: SCE shall provide schedule updates throughout the construction process to ensure compliance with this mitigation measure Following Construction: N/A 	All Proposed Project locations

 $^{^{1} \} Certified \ Street \ Sweeper, \ June \ 1, 2016, \ http://www.aqmd.gov/docs/default-source/rule-book/support-documents/rule-1186/certified-street-sweepers-equipment-list.pdf?sfvrsn=2.$

Environmental Protection Element/Mitigation Measure	Performance Standard and Timing	Location
 MM AQ-04: Limitation of Daily Construction Vehicles and Equipment Use (MM for Alternatives). The following equipment limitations apply to the identified construction activities: Vault Installation 	 Prior to Construction: SCE shall submit calculation evidence to the CPUC for review at least 2 weeks prior to construction During Construction: Monitor the maximum number of vehicles and equipment used in any one day for five construction activities; Vault Installation, Duct Bank Installation, Underground Cable Installation, 	Construction of Alternatives 1, 2, 3, and 4 in combination with the Proposed Project
 No more than 38 vehicles/equipment may be operating on an active work site, including truck trips providing materials to and from the work site, and 20 worker vehicles, in any one day 		
Duct Bank Installation	Cable Terminating, Cable Splicing, and Jack and Bore • Following Construction: N/A	
 No more than 30 vehicles/equipment may be operating on an active work site, including truck trips providing materials to and from the work site, and 20 worker vehicles, in any one day 	• Following Construction: IV/A	
Underground Cable Installation		
 No more than 7 vehicles/equipment may be operating on an active work site, including truck trips providing materials to and from the work site, and 10 worker vehicles, in any one day 		
Cable Terminating		
 No more than 5 vehicles/equipment may be operating on an active work site, including truck trips providing materials to and from the work site, and 8 worker vehicles, in any one day 		
Cable Splicing		
 No more than 8 vehicles/equipment may be operating on an active work site, including truck trips providing materials to and from the work site, and 16 worker vehicles, in any one day 		
Jack and Bore (trenchless)		
 No more than 12 vehicles/equipment may be operating on an active work site, including truck trips providing materials to and from the work site, in any one day 		
Biological Resources		
MM BIO-01: Habitat Conservation and MSHCP Compliance (from 2013 RTRP EIR). The Project Proponent (RPU) shall pay the MSHCP fees in compliance with the MSHCP. Fees will be based on design footprint and confirmed by as-built data as available and applicable to confirm mitigation compliance and as negotiated with RCA for the public facility. The Proposed Project (responsibility of RPU and SCE) shall also comply with all other applicable MSHCP and SKRHCP requirements. The Proposed Project shall also implement the urban/wildlands interface requirements of the MSHCP for all areas adjacent to conservation areas.	 Prior to Construction: Engage the RCA to secure a consistency determination to obtain coverage for take under the MSHCP During Construction: Comply with conditions and requirements of the MSHCP 	All Proposed Project locations
	 Following Construction: Comply with conditions and requirements of the MSHCP 	
MM BIO-01A: Verification of MSHCP Compliance. SCE shall provide the CPUC with all documentation, studies, and plans submitted to the RCA by RPU (the MSHCP Permittee) as part of the permitting process to obtain coverage under the MSHCP. Such documentation shall include Development of a Biologically Equivalent or	Prior to Construction: Provide CPUC with any documentation, studies, and plans submitted to the RCA	All Project locations included in the CPCN.
Superior Preservation Report for all riparian habitat impacts. Upon completion of the permitting process, SCE shall provide the CPUC with any conditions of approval or other requirements provided by the RCA. These conditions and requirements will be incorporated into the project Mitigation Monitoring, Compliance, and	• During Construction : Comply with conditions and requirements of the MSHCP	
Reporting Plan.	• Following Construction: Comply with conditions and requirements of the MSHCP	
MM BIO-02: Avian Protection on Power Lines (from 2013 RTRP EIR). All transmission structures (TSPs and LSTs) would be designed to be avian-safe in accordance with "Suggested Practices for Raptor Protection on Power Lines: the State of the Art in 2006" (Avian Power Line Interaction Committee, 2006). This will include, but is not limited to, the following:	 Prior to Construction: Design structures to be compliant with guidelines During Construction: Construct project elements according to design 	All TSPs and LSTs erected as part of Proposed Project
 Conductors will be spaced to an acceptable distance of raptors such as red-tailed hawk and golden eagle to avoid potential electrocution risk; 	• Following Construction: N/A	-7
Bus bars or other points of electrocution shall be covered with non-conductive caps;		
 Aerial span of the Santa Ana River will be marked with best available UV reflectors (bird diverters) every 100 feet and staggered along the conductors; and 		
• Nest deterrents will be implemented.		
The Proposed Project shall implement APLIC guidelines (current guidelines as of 2011). Designs for APLIC compliance will be reviewed and approved by SCE, RPU and the Project Biologist (69-kV section will not include SCE approval).		

Environmental Protection Element/Mitigation Measure	Performance Standard and Timing	Location
MM BIO-03: Preconstruction Surveys for Sensitive Species and MSHCP Compliance (from 2013 RTRP EIR) Western burrowing owl (BUOW): 1) Conduct focused surveys to determine active or potential nest sites during the breeding season prior to initiation of field construction disturbance. Use observed active burrow location data to schedule construction activity in the area of the active burrows to occur between September 1 and February 1. Adjust pole location or potential access roads to avoid active burrows. 2) Conduct pre-construction surveys for BUOW between 14 and 30 days prior to field construction disturbance. Owls located during the pre-construction survey shall be reported to the RCA. 3) Avoidance and minimization measures, including installation of fencing and/or screening appropriate to clearly mark work restriction limits and, as practical, screening line of sight to active, occupied burrows, shall be installed and also reported to the RCA. Avoidance and minimization of indirect impacts to BUOW will be in accordance with the CDFW Staff Report on Burrowing Owl Mitigation, dated March 7, 2012. A biological monitor shall also be placed where avoidance and minimization measure have been installed to monitor owl activity and to ensure barriers are suitable in accordance with MM BIO-06. Narrow endemic plants: For the MSHCP narrow endemic plant species are encountered and cannot be avoided then seed will be salvaged. Salvaged seed will be stored and used for restoration of temporarily disturbed suitable soils and site conditions. Bats: Conduct sensitive plant species are encountered and cannot be avoided then seed will be salvaged. Salvaged seed will be stored and used for restoration of temporarily disturbed suitable soils and site conditions. Bats: Conduct sensitive bat species (western mastiff bat and western yellow bat) roost emergence surveys at appropriate times of the year (year-round survey is satisfactory) in areas of suitable roost habitat that has the potential to be affected by construction. Activ	 Prior to Construction: 1) Conduct required surveys; 2) Monitor owl activity; 3) Consult with RCA and CDFW if needed; 4) Adjust or relocate final structure locations, access and spur roads, and associated temporary ground disturbance areas to avoid direct impacts to sensitive species if needed During Construction: N/A Following Construction: N/A 	All structure locations, access and spur roads, and associated temporary ground disturbance areas
MM BIO-04: Nocturnal Lighting Minimization and Prevention (from 2013 RTRP EIR). Nocturnal lighting during construction and normal operation would be minimized at the substation sites by using directional lighting (shielded and positioned downward) to minimize indirect impact by stray light on the surrounding habitat. All external building or permanent structure lighting (except FAA warning lights) shall be shielded and light canopy contained to the facility substation footprint. Minimize stray and extraneous lighting. Lighting plans will be reviewed and approved by the Project Biologist and RPU prior to construction, and any further recommendations from the Project Biologist regarding lighting shall be implemented.	 Prior to Construction: N/A During Construction: Implement measures to minimize and prevent nocturnal lighting Following Construction: N/A 	All project areas that require the use of nocturnal lighting
MM BIO-05: Worker Environmental Awareness Program (WEAP) Design and Implementation (from 2013 RTRP EIR). A WEAP shall be prepared. Field construction project personnel including construction management, construction crews and contractors shall be required to participate in WEAP training prior to starting work on the project. WEAP will be presented as a PowerPoint presentation or through a manual or handbook. Include discussion of sensitive species, habitat, water quality protection, hazardous material spill prevention and cleanup, and minimizing impact to wildlife and adjacent vegetation. The Project Biologist will determine any exemption from the training requirement (i.e., vendors, subcontractor truck drivers, delivery drivers).	 Prior to Construction: 1) Prepare a WEAP; 2) Construction personnel receive WEAP prior to starting work on the project During Construction: Construction personnel receive WEAP prior to starting work on the project Following Construction: N/A 	N/A
MM BIO-06: Environmental Compliance Monitoring During Construction (from 2013 RTRP EIR). Environmental Compliance Monitors would be present during construction activity with the potential to affect biological sensitive resources, and periodically during other construction activity. Monitoring will be required for vegetation clearing and when construction occurs in the vicinity of sensitive biological resources. Monitoring will be conducted periodically as determined by the Project Biologist during remaining project construction to confirm work limits are maintained and protected resources are avoided.	 Prior to Construction: N/A During Construction: Environmental Compliance Monitors monitor construction activities Following Construction: N/A 	All project areas where biological sensitive resources occur or have the potential to occur
MM BIO-07: Minimize Amount of Vegetation Removal and Permanent Loss of Habitat (from 2013 RTRP EIR). Vegetation clearing or removal would be restricted to surveyed and approved limits of the ROW, Substation footprint, Access Roads, and Staging Areas. Vegetation removal would be limited in sensitive habitats (the intent is to disturb less than the approved project work limits). The contractor would use overland access that crushes vegetation to maintain root structure and enable resprouting and faster restoration, use existing roads or jeep trails, and minimizes disturbance of new areas and removal of mature tree, cactus or woody shrub vegetation. Prior to clearing, conduct topsoil salvage evaluation to determine if soil is suitable for salvage, in which case it would be used for restoration onsite, by being generally free of non-native weed species, trash, or other contaminants that would limit usefulness during restoration and revegetation. Topsoil found not suitable for salvage will not need to be segregated from subsoils.	 Prior to Construction: N/A During Construction: Restrict vegetation removal to surveyed and approved limited areas Following Construction: N/A 	All project areas where vegetation removal is required

Environmental Protection Element/Mitigation Measure Performance Standard and Timing Location MM BIO-08: Migratory Bird Treaty Act Compliance: Avoidance of Active Nests (from 2013 RTRP EIR). • Prior to Construction: Conduct preconstruction nest surveys during All project areas where All observed active nests detected during pre-construction surveys would be avoided in compliance with the Migratory Bird Treaty Act (this excludes February 15 through August 15 no more than two to three days prior active nests are detected European starling, house sparrow, rock pigeon), unless approval is obtained from the USFWS. to vegetation clearing and ground disturbance All surveys would be conducted by qualified biologists approved, as applicable, by USFWS, CDFW, and RCA. • During Construction: Avoid observed active nests Raptors: Conduct raptor nest surveys beginning in the middle of January within six months prior to construction to determine presence of active raptor nests • Following Construction: N/A within 500 feet of the work limits, laydown yard, or other active Project locations where work may disturb an active nest. Establish work restriction areas for active nests. Coordinate with CDFW for potential to deter nesting (e.g., temporarily cover stick nest). • From February 15 through August 15, conduct pre-construction nest surveys no more than two to three days prior to vegetation clearing or ground disturbance in order to identify active nests and avoid direct or indirect impact in accordance with MBTA. Timing would be dependent on nesting conditions and proposed construction activity. If active nests are unavoidable, RPU and SCE would consult with the appropriate agencies (USFWS and CDFW) and implement their recommendations. Unless otherwise approved by the regulatory agencies, work will be restricted within 500 feet (line of sight) for raptors or sensitive species and 100 feet for other passerines. Work will be restricted around any observed active nest of a bird covered by the MBTA until the Project Biologist determines the nest has naturally failed, been lost to predation, or chicks are fledged and satisfactorily independent of nest or roost tree. Work restriction limit will be reviewed by the Project Biologist with the ability to stop work to avoid impact to active nest. Nest is identified as active during incubation through fledging when chicks are independent of nest or nest tree in respect to raptors. Nests observed in areas of active construction would be avoided and monitored per the Project Biologist and in consultation with CDFW or USFWS. • Prior to Construction: Ensure all equipment and materials used in MM BIO-09: Invasive Species Management (from 2013 RTRP EIR). The project biologist would prepare measures to avoid or minimize the introduction of invasive All Proposed Project project construction are weed-free and free of eggs or adults of plant, invertebrate, and vertebrate species into the project area during construction activities. Construction equipment being brought to the Project limits will be locations invasive species free of accumulated mud and debris. Equipment will be washed prior to project delivery to remove dirt from tracks, body, and attachments. Equipment with accumulated mud or debris will not be allowed to work within the project right-of-way until it is sufficiently clean (cleaning can be completed in a wash station at • During Construction: Maintain all equipment and project areas free the laydown yard or offsite at another location not associated with the Project). Areas disturbed by construction will be maintained to control non-native invasive of weeds and invasive pest species weed species and areas not designed to be bare for fire safety or have other soil stabilization (e.g., gravel, asphalt) will be revegetated and established to be less • Following Construction: Monitor disturbed areas to ensure that than 10-percent coverage by non-native weed species (goal will be to establish native cover equal or exceeding adjacent habitat) or have coverage of density and invasive weeds do not establish themselves diversity equal to or exceeding 70 percent of adjacent native habitat. (It is expected that adjacent habitat may include non-native grassland. In these areas, the goal

will be to establish cover consistent with adjacent areas, with an equal to or less than cover and density as found adjacent).

Environmental Protection Element/Mitigation Measure	Performance Standard and Timing	Location
MM BIO-09A: Weed Control Plan. To support invasive species management, SCE shall prepare and implement a comprehensive Weed Control Plan for invasive, non-native species abatement. Developed land shall be excluded from weed control. The Weed Control Plan shall include specific weed abatement methods, practices, and treatment timing developed specifically for the Project area by qualified individuals with at least 5 years of weed control experience within Riverside, Los Angeles, and San Bernardino Counties. The Weed Control Plan shall address control methods and issues controlling invasive non-native species within all vegetation communities and land cover types found along the Project alignment in consultation with the Riverside County Agricultural Commissioner's Office and the California Invasive Plant Council (Cal-IPC). The Weed Control Plan shall be submitted to the CPUC for review and approval at least 30 days prior to construction. The Weed Control Plan shall include the following: • A pre-construction weed inventory shall be conducted by surveying Project work areas and areas immediately adjacent to Project work areas for weed populations that are (1) considered by the Riverside County Agricultural Commissioner, the City of Riverside, or the City of Jurupa Valley as being a priority for control, and (2) weed populations that are rated High or Moderate for negative ecological impact in the California Invasive Plant Inventory (online) Database (Cal-IPC 2006 [and 2007 update]; http://www.cal-ipc.org/ip/inventory/index.php). These populations shall be mapped and described according to density and area covered. These plant species shall be treated prior to construction or at a time when treatments would be most effective based on phenology according to control methods and practices for invasive weed populations included in the Weed Control Plan designed in consultation with the Riverside County Agricultural Commissioner's Office and Cal-IPC, as appropriate. • Weed control treatments shall include all legall	 Prior to Construction: SCE submits the Weed Control Plan to CPUC for review and approval at least 30 days prior to construction During Construction: (1) SCE treats all weeds in accordance with the approved Weed Control Plan, (2) SCE prepares an annual weed inventory and monitoring report for submittal to CPUC Following Construction: (1) SCE submits annual monitoring reports for 2 years after construction is complete, (2) SCE continues to treat all weeds in accordance with the approved Weed Control Plan, as necessary 	All Project locations included in the CPCN.
MM BIO-10: Avoid Impacts to Federal and State Jurisdictional Wetlands (from 2013 RTRP EIR). Construction crews would not fill or dredge streambeds and banks of streams or delineated wetlands (jurisdictional, vernal pool, or otherwise regulated) along the route. If it is determined during final design of the Project that impacts to wetlands or riparian habitat may occur, a habitat assessment and, if necessary, a formal wetland delineation, will be conducted. If it is determined that impacts to wetlands and/or jurisdictional waters cannot be avoided, authorization from the U.S. Army Corps of Engineers, California Department of Fish and Wildlife (CDFW), and/or Regional Water Quality Control Board will be obtained after appropriate environmental review. A Lake or Streambed Alteration Agreement if applicable would be secured from CDFW. All permit conditions will be followed to ensure that impacts remain less than significant.	 Prior to Construction: 1) Conduct formal wetland delineation if needed; 2) Obtain necessary permits During Construction: 1) Follow permit conditions; 2) Avoid impacts to federal and state jurisdictional wetlands Following Construction: N/A 	All project areas where federal and state jurisdictional wetlands occur
MM BIO-11: Refueling – Streambed Protection (from 2013 RTRP EIR). Avoid the fueling of equipment adjacent to drainages, tributaries, or wetlands and associated plant communities to preclude water quality impacts. Associated plant communities should be designated on construction maps and will be situated a minimum distance of 10 meters from drainages, wetlands and storm drain inlets. Contractor equipment shall be checked for leaks prior to operation near riparian areas in coordination with the project biologist.	 Prior to Construction: N/A During Construction: Avoid the fueling of equipment adjacent to drainages, tributaries, or wetlands and associated plant communities Following Construction: N/A 	All project areas where refueling occurs
MM BIO-12: Wildlife Protection (from 2013 RTRP EIR). Excavations deeper than 0.3 m (1.0 ft) will be covered overnight to minimize the potential for vertebrates becoming trapped. Prior to backfilling, excavations will be inspected and observed; trapped wildlife species will be safely removed and released in an adjacent non-construction area.	 Prior to Construction: N/A During Construction: 1) Cover excavations deeper than 0.3 m (1.0 ft); 2) Inspect excavations for wildlife species before backfilling Following Construction: N/A 	All project areas where excavations occur
MM BIO-13: MSHCP – Public / Quasi-Public (PQP) Land Conservation (from 2013 RTRP EIR). RPU would replace permanent footprint impacts to identified MSHCP PQP Conserved Lands at a ratio of 1:1. Replacement land would be of suitable habitat value to provide a wildlife resource for foraging or breeding. Land would not be required to support or have the potential to support a sensitive plant or animal species. As approved by RCA and responsible Regulatory Agencies, lands purchased for replacement of Land and Water Conservation Fund land conversion may also be used as the PQP replacement lands.	 Prior to Construction: Applicant pays fee levied and provides payment confirmation During Construction: N/A Following Construction: N/A 	N/A

Environmental Protection Element/Mitigation Measure	Performance Standard and Timing	Location
MM BIO-14: Delhi Sands Flower Loving Fly Surveys and Mitigation. SCE shall conduct Delhi sands flower loving fly (DSFLF) surveys in accordance with USFWS Interim General Survey Guidelines for the Delhi Sands Flower-Loving Fly (USFWS,1996) within 12 months prior to construction within DSFLF suitable habitat. If the DSFLF habitat within the project site is determined to be occupied, 75 percent of the mapped Delhi Soils on site will be conserved. If it is determined that 75 percent conservation on the occupied site is infeasible or USFWS concurs that such conservation would not contribute to the long-term conservation of the species, conservation may occur within the conservation areas identified in Objective 1A at a ratio of three times (3:1) the mapped Delhi soils or, subject to USFWS concurrence, the habitat of the species as identified by survey biologist on the identified occupied site.	 Prior to Construction: Conduct DSFLF survey within 12 months prior to construction. If habitat is occupied, preserve soils on site or conduct off-site mitigation. During Construction: N/A Following Construction: N/A 	Within DSFLF mapped suitable habitat
MM BIO-15: Determination of a Biologically Equivalent or Superior Preservation. SCE shall prepare a Determination of a Biologically Equivalent or Superior Preservation (DBESP) at least 90 days prior to construction within riparian habitat areas. The Determination of Biologically Equivalent or Superior Preservation will include quantification of unavoidable impacts to riparian/riverine areas associated with the project, including direct and indirect effects; a written description of project design features and mitigation measures that reduce indirect effects, such as edge treatments, landscaping, elevation difference, minimization and/or compensation through restoration or enhancement; and a finding demonstrating that although the Proposed Project would not avoid impacts, with proposed design and compensation measures, the project would be biologically equivalent or superior to that which would occur under an avoidance alternative without these measures. In addition, prior to approval of Biologically Equivalent or Superior Preservation Determinations, the Wildlife Agencies will be notified and be provided a 60-day review and response period.	 Prior to Construction: SCE submits the DBESP to agencies at least 90 days prior to construction in riparian areas; documentation of a DBESP approval must be received prior to impacts in riparian areas During Construction: SCE implements the measures in the DBESP Following Construction: SCE conducts annual monitoring and reporting as required in the approved DBESP 	Temporary and permanent impacts on riparian habitat
Cultural, Tribal Cultural, and Paleontological Resources		
EPE CUL-01: Avoid or Minimize Impacts to Significant Cultural Resources. Ground disturbance or other impacts to each identified cultural resource would be avoided or minimized, unless the resource has been determined to be ineligible for the National Register of Historic Places (NRHP) and/or the California Register of Historical Resources (CRHR). Avoidance measures could include project redesign, flagging of site boundaries during construction, use of buffer zones, and construction monitoring.	 Prior to Construction: N/A During Construction: Avoid or minimize ground disturbance to identified cultural resource, unless resource has been determined to be ineligible for the NRHP and/or CRHR Following Construction: N/A 	Active construction areas
EPE CUL-02: Establish and Maintain a Protective Buffer Zone Around Each Recorded Cultural Resource Within or Immediately Adjacent to the ROW or Access and Spur Roads. A protective buffer zone would be established around each recorded archaeological site and treated as an "environmentally sensitive area" within which construction activities and personnel would not be permitted, unless the archaeological site has been determined to be ineligible for the National Register of Historic Places (NRHP) and/or the California Register of Historical Resources (CRHR).	 Prior to Construction: Establish protective buffer zones around each recorded cultural resource During Construction: Establish protective buffer zones around each recorded cultural resource Following Construction: N/A 	Active construction areas
EPE CUL-03: Evaluate Cultural Resources. Evaluate the significance of all cultural resources that cannot be avoided. Evaluation studies would be conducted and documented as per applicable laws, regulations, and guidelines of the CRHR and NRHP.	 Prior to Construction: Evaluate and document significant cultural resources During Construction: Evaluate and document significant cultural resources Following Construction: N/A 	Active construction areas
EPE CUL-04: Minimize Impacts to Significant Cultural Resources that Have Not Yet Been Previously Evaluated and That Cannot be Avoided. All ground-disturbing activities would be minimized within the bounds of unique archaeological sites, historical resources, or historic properties. Historical resources and unique archaeological resources where impacts cannot be reduced or minimized will be treated through the implementation of CUL-05. Minimization measures will include pre-construction identification of the most sensitive parts of sites and construction monitoring.	 Prior to Construction: N/A During Construction: Minimize impacts to significant cultural resources. Implement the Construction Monitoring and Unanticipated Cultural Resources Discovery Plan. Following Construction: N/A 	Active construction areas
EPE CUL-05: Construction Monitoring and Unanticipated Cultural Resources Discovery Plan. Prior to construction, a Construction Monitoring and Unanticipated Cultural Resources Discovery Plan would be prepared. Resources identification and assessments for eligibility of the resources for listing in the CRHR will be consistent with the California Office of Historic Preservation Standards. The plan would detail procedures for avoidance and mitigative data recovery.	 Prior to Construction: Prepare a Construction Monitoring and Unanticipated Cultural Resources Discovery Plan During Construction: N/A Following Construction: N/A 	Active construction areas

Environmental Protection Element/Mitigation Measure	Performance Standard and Timing	Location
which right of entry was not granted prior to any disturbance. All surveys shall be conducted and documented as per applicable laws, regulations, and guidelines. The surveys will be completed to identify any previously unidentified cultural resources. Any discovered resources would be avoided through Project features (EPEs) or mitigated through MM CUL-02.	 Prior to Construction: Conduct cultural resource inventory if changes to the Proposed Project area or any properties for which right of entry was not granted During Construction: Avoid cultural resources identified in the cultural resource inventory Following Construction: N/A 	Active construction areas
monitor ground-disturbing activities near previously identified cultural resources. If a newly identified cultural resource or an unknown component of a previously identified resource is discovered during construction, the monitor will follow the Unanticipated Discovery Plan identified in EPE CUL-05. The monitor will have the authority to stop or redirect work, as required to fulfill mitigation measure CUL-02. In addition, any human remains discovered during Project activities will be protected in accordance with current state law as detailed in California Health and Safety Code 7050.5 and California Public Resources Code Sections 5097.91 and	 Prior to Construction: N/A During Construction: Ground disturbance near known cultural resources is monitored; Unanticipated Discovery Plan is implemented if needed; Procedures for discovery of human remains implemented per state law Following Construction: N/A 	All Proposed Project areas where ground disturbance occurs
disturbing activities near previously identified cultural resources. In addition, a qualified archaeologist will monitor all ground-disturbing activities along the Proposed Project alignment between Lucretia Avenue in Jurupa Valley and the Wildlife Substation. If a newly identified cultural resource or an unknown component of a previously identified resource is discovered during construction, the monitor will follow the Cultural Resources Monitoring and Treatment Plan (CRMTP) as defined in MM CUL-02B. The monitor will have the authority to stop or redirect work, as required to avoid and/or minimize impacts on tribal cultural	 Prior to Construction: N/A During Construction: Ground disturbance near (1) known cultural resources and (2) the Proposed Project alignment between Lucretia Avenue and Wildlife Substation is monitored; CRMTP is implemented if needed Following Construction: N/A 	All Proposed Project areas where ground disturbance occurs
combined with the Construction Monitoring and Unanticipated Cultural Resources Discovery Plan and shall be submitted at least 30 days prior to construction to	 Prior to Construction: SCE submits a Discovery Plan and CRMTP to the CPUC at least 30 days prior to construction During Construction: SCE implements the Discovery Plan and CRMTP including all monitor and discovery treatment requirements Following Construction: N/A 	All Proposed Project areas where ground disturbance occurs

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and a_fully executed Cultural Resources Monitoring and Treatment Agreement with the monitoring tribe(s) outreach efforts and the name and credentials of the proposed Native American monitor(s) to the CPUC for approval at least 14 days prior to construction. The Tribes shall be given 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, the consulting 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. The tribal cultural monitor(s) shall inform the archaeological monitor if any previously undiscovered tribalcultural resources are discovered. The archaeological monitor shall be granted the authority to temporarily halt grading in the immediate area of a find in order to evaluate the find and determine the appropriate next steps, in consultation with the Project archaeologist.

Cultural Resource Monitoring

- The purpose of cultural resource monitoring is to ensure proper implementation of all avoidance procedures so that cultural resources, if present, are not irretrievably lost, damaged, destroyed, or otherwise adversely affected. Cultural resource monitoring shall be conducted during all ground-disturbing activities (i.e., vegetation clearing, excavation, grading, and staging area/marshalling yard preparation within unpaved yards). The requirements for archaeological and tribal cultural monitoring shall be noted on construction plans and the worker environmental awareness training handouts. Monitors shall cease monitoring if older quaternary alluvium soils and/or bedrock is encountered.
- Monitoring teams shall work under the direct supervision of the Qualified Archaeologist in conjunction with a tribal cultural monitor. The Qualified
 Archaeologist and tribal cultural monitor shall attend preconstruction meetings for the project. Monitoring teams shall include one qualified archaeological
 monitor and one tribal cultural monitor. In the event that ground-disturbing activities occur simultaneously in multiple locations requiring monitoring, a
 monitoring team shall be required at each location.

Cultural Resources Management and Treatment Plan

- Mapping. The CRMTP shall include a map of all known California Register-eligible or potentially-eligible resources in and within 50 feet of work areas. Maps shall be updated by the Project Archaeologist as necessary to incorporate any new information obtained.
- Environmentally Sensitive Areas (ESA) Delineation. The CRMTP shall describe how historical resources eligible or potentially eligible for listing in the California Register of Historic Resources (CRHR), significant archaeological resources, and tribal cultural resources deemed significant by the tribe(s) (collectively referred to as "significant resources") will be delineated and avoided as ESAs during construction. ESAs containing cultural resources shall not be identified on maps to be used by anyone other than the Qualified Archaeologist, archaeological monitors, and tribal cultural monitors. They shall be labeled on maps that would be used by the Qualified Archaeologist, archaeological monitors, and tribal cultural monitors, and with signage in the field as "environmentally sensitive areas." The sole preferred method of mitigation in the CRMTP for known significant resources shall be total avoidance of the resource (preservation in place), per CEQA Guidelines Section I 5126.4(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 by the CPUC, the Qualified Archaeologist, in consultation with CPUC, SCE, and consulting tribe(s), shall prepare an Evaluation Plan and Data Recovery Plan.
- Unanticipated Resource Discovery. 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 50 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, consulting tribe(s), and the CPUC shall be notified. No work will resume in the area until the Qualified Archaeologist, consulting tribe(s), 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 CEOA Guidelines Section 15126.4(b)(3)(A).
- Determination if a Resource is an Historical Resource. The Qualified Archaeologist, in consultation with the consulting tribe(s) and the CPUC, shall determine if there is a potential for the resource to be an historical resource that is potentially eligible for the California Register of Historic Places (CRHP), National Register of Historic Places (NRHP), or is a Tribal Cultural Resource of significance to the consulting tribes(s). If there is no potential for the resource to qualify as an historical resource eligible for the CRHP or NRHP, or is not deemed to be a Tribal Cultural Resource of significance to the tribe(s), work shall resume after CPUC and tribal consultation and review, and CPUC approval or concurrence. The CRMTP shall include a framework for evaluating cultural resources that may also be historical resources. If there is a potential for the resource to be an eligible historical resource or historic Tribal Cultural Resource of significance to the tribe(s), the Qualified Archaeologist shall prepare an Evaluation Plan, in consultation with consulting tribe(s) if appropriate.
- Evaluation Plan. The resource-specific Evaluation Plan shall detail the procedures to be used to determine if the discovery is an historical resource eligible listing on the CRHP or NRHP, or is a Tribal Cultural Resource of significance to the tribe(s). The Evaluation Plan shall include sufficient discussion of background and context to allow the evaluation of the resource against the appropriate 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, photography, and consultation with the consulting tribe(s). For archaeological resource testing, the Evaluation Plan shall describe the archaeological testing procedures, including, but not limited to: surface collection (if surface artifacts are discovered), test excavations (including type,

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number, and location of test pits and/or trenches), analysis methods (and if a tribal cultural resource, in consultation with the consulting tribe(s) as to appropriate methods of testing, if any, with the understanding that no destructive testing on such resources may commence until the Qualified Archaeologist has consulted with the consulting tribe(s) and unless the testing is agreed to in writing by the consulting tribe(s)), and reporting procedures. The Evaluation Plan shall be submitted to the consulting tribe(s) (if appropriate) and the 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 historical resource. If the discovery is not found to be a historical resource, and the consulting tribe(s) (if appropriate) 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 historical resource, SCE shall prepare a Data Recovery Plan, in consultation with the consulting tribe(s), if appropriate.

- Data Recovery Plan. Data recovery plans for historical resources that cannot be fully avoided shall be prepared in accordance with CEQA Guidelines Section I 5126.4(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 (no destructive testing may be undertaken until the Qualified Archaeologist has consulted the consulting tribe(s)) and the testing is agreed to in writing by the consulting tribe(s), 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 a historical resource, and reporting procedure. This plan shall be submitted to the consulting tribe(s) for review (if appropriate), and the CPUC for review and approval upon consideration of consulting tribe(s) review. Once approved, the applicant shall implement the approved plan. Once the data recovery field work is complete, a Data Recovery Field Memo shall be prepared and provided to the CPUC and consulting tribe(s), if appropriate.
- Data Recovery Field Memo. Following implementation of the Data Recovery Plan, the Data Recovery Field Memo shall be prepared whenever an unanticipated resource is discovered during construction. 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 (no such testing may be undertaken on tribal cultural resources until the Qualified Archaeologist has consulted the consulting tribe(s)), obsidian sourcing, pollen analysis, microbotanical analysis, and others, as applicable. The Data Recovery Field Memo shall be submitted to the 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 tribal cultural resources or archaeological or prehistoric resources, the Data Recovery Field Memo shall also be submitted to the consulting tribe(s) per the procedures outlined in the Data Recovery Plan. A Data Recovery Report shall then be prepared.
- Data Recovery Report. 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 consulting tribe(s) for review, if appropriate, and 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 tribal cultural resources or archaeological or prehistoric resources, the Data Recovery Report shall also be submitted to the consulting tribe(s) 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 and the Native American Heritage Commission. 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.

MM CUL-02C: Cultural Resource Training. All project personnel shall receive project-specific cultural resource training prior to working on the project. The training shall address appropriate work practices necessary to effectively implement project requirements, including EPEs and mitigation measures for historical resources, archaeological resources, tribal cultural resources, and human remains. The training shall address the potential for exposing subsurface resources, basic indicators of a potential resource, and required procedures if a potential resource is identified, consistent with the procedures set forth in MM CUL-02A through MM CUL-02E.

SCE shall submit the cultural resource training materials to the CPUC for approval no less than 30 days before construction. Cultural resource training materials may be submitted as part of the general Worker Environmental Training Program for the project.

- Prior to Construction: Cultural resource training materials are submitted to the CPUC at least 30 days prior to construction
- During Construction: All project personnel receive the CPUCapproved cultural resources training prior to working on the site
- Following Construction: N/A

N/A

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MM CUL-02D: Procedures for Discovery of Human Remains. In the event that human remains or suspected human remains are identified, SCE shall comply with California law (Heath and Safety Code § 7050.5; PRC §§ 5097.94, 5097.98, and 5097.99). The area shall be flagged off and all construction activities within 100 feet (30 meters) of the find shall immediately cease. The Qualified Archaeologist and SCE shall be immediately notified, and the Qualified Archaeologist shall examine the find. If the Qualified Archaeologist determines that there may be human remains, SCE shall immediately contact the Medical Examiner at the Riverside County Coroner's office. The Medical Examiner has two (2) working days to examine the remains after being notified by SCE. If the Medical Examiner believes the remains are Native American, he/she shall notify the NAHC within 24 hours. If the remains are not believed to be Native American, the appropriate local law enforcement agency shall be notified. The NAHC shall immediately notify the person it believes to be the most likely descendant (MLD) of the remains, and the MLD has 48 hours of being granted access to the site to visit the discovery and make recommendations to the landowner or representative for the respectful treatment or disposition of the human remains and any associated grave goods. If the MLD does not make recommendations within 48 hours of being granted access to the site, the remains shall be reinterred in the location they were discovered and the area of the property shall be secured from further disturbance. If there are disputes between the landowner, and the MLD, the NAHC shall mediate the dispute and attempt to find a solution. If the mediation fails to provide measures acceptable to the landowner, the landowner or their representative shall reinter the remains and associated grave goods and funerary objects in an area of the property secure from further disturbance. The location of any reburial of Native American human remains shall not be disclosed to the public and	 Prior to Construction: N/A During Construction: Implement procedures if human remains are discovered Following Construction: N/A 	All Proposed Project areas where ground disturbance occurs
MM CUL-02E: Tribal Cultural Resource Avoidance Procedures. SCE shall submit final construction plans to the consulting tribes and the CPUC at least 60 days prior to construction. The CPUC shall review these plans with the consulting tribes to identify any potential conflicts between the final work spaces/infrastructure locations (e.g., pole or vault locations, spur roads) and recorded tribal cultural resources. Where potential conflicts exist, the cultural resource(s) shall be evaluated according to the procedures identified in MM CUL-02B. When any changes in proposed activities are necessary to avoid cultural resources (e.g., project modifications or redesign), construction plans shall be modified to reflect the agreed upon changes before initiating any construction activities in the area subject to the change. Revised construction plans shall be submitted to the CPUC and affected consulting tribes at least 14 days prior to construction for confirmation of incorporated changes. In the event of an inadvertent discovery, no activities shall be conducted within the boundaries of a known tribal cultural resource until SCE has obtained concurrence on avoidance and minimization methods from affected consulting tribes. The CPUC shall make a final determination if SCE cannot obtain concurrence from the tribes within 60 days of initial identification of the potential cultural resource conflict. Designated approved work spaces shall be physically demarcated under the direction of the Qualified Archaeologist, in consultation with the tribal cultural monitor, to ensure exclusion of known tribal cultural resources. Construction crews shall be instructed to work within designated approved work areas.	 Prior to Construction: SCE submits final construction plans to the CPUC and consulting tribes at least 60 days prior to construction; Potential cultural resource conflicts are evaluated per MM CUL-02B. Revised construction plans submitted to CPUC for confirmation of incorporate changes at least 14 days prior to construction. During Construction: Work spaces are physically demarcated and crews are instructed to stay within designated work spaces Following Construction: N/A 	All Proposed Project areas where ground disturbance occurs
MM CUL-03: Paleontological Pre-Construction Coordination (from 2013 RTRP EIR). A qualified paleontological monitor shall attend any pre-construction meetings at locations that have high potential for containing intact paleontological resources to consult with grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues. A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials. The paleontological monitor shall work under the direction of a qualified paleontologist. A qualified paleontologist is defined as an individual with an M.S. or PhD in paleontology or geology, or closely related field, who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology and paleontology of Southern California, and who has worked as a paleontological mitigation project supervisor in the region for at least 1 year.	 Prior to Construction: A qualified paleontological monitor attends pre-construction meetings During Construction: N/A Following Construction: N/A 	Excavations in project areas with a high paleontological sensitivity
MM CUL-04: Paleontological Monitoring (High-Sensitivity Formations) (from 2013 RTRP EIR). A qualified paleontological monitor shall spot-check the original cutting of previously undisturbed deposits of high paleontological resource sensitivity (e.g., Older Quaternary Alluvium). The paleontological monitor shall work under the direction of a qualified paleontologist.	 Prior to Construction: N/A During Construction: Spot-checking during construction Following Construction: N/A 	Excavation in project areas with a high paleontological sensitivity
MM CUL-04A: Paleontological Monitoring (Low-Sensitivity Formations). Ground-disturbing activities that occur in areas with indeterminate, low, or marginal paleontological sensitivity may be monitored on a part-time basis as outlined in the Paleontological Monitoring and Treatment Plan (PMTP) prepared by the qualified paleontologist.	 Prior to Construction: N/A During Construction: Spot-checking during construction Following Construction: N/A 	Excavations in project areas as required by the PMTP

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MM CUL-05: Significant Fossil Recovery (from 2013 RTRP EIR). When significant fossils are discovered, the paleontologist (or paleontological monitor) shall recover them. In most cases, this fossil salvage can be completed in a short period of time. Because of the potential for the recovering of small fossil remains, such as isolated mammal teeth, it may be necessary to recover bulk sedimentary matrix samples for off-site wet screening. However, some fossil specimens (such as complete large mammal skeletons) may require an extended salvage period. In these instances, the paleontologist (or paleontological monitor) should be allowed to temporarily direct, divert, or halt earthwork activities to allow recovery of fossil remains in a timely manner.	 Prior to Construction: N/A During Construction: Fossils found during construction are salvaged Following Construction: N/A 	Excavations in project areas with a high paleontological sensitivity
MM CUL-06: Significant Fossil Treatment (from 2013 RTRP EIR). Fossil remains collected during monitoring and salvage shall be cleaned, repaired, sorted, and cataloged as part of the mitigation program.	 Prior to Construction: N/A During Construction: Fossils are cleaned, repaired, sorted, and catalogued Following Construction: N/A 	N/A
MM CUL-07: Fossil Donation (from 2013 RTRP EIR). Prepared fossils, along with copies of all pertinent field notes, photos, maps, and measured stratigraphic sections, shall be deposited (as a donation) in a scientific institution with permanent paleontological collections, such as the Western Center for Archaeology and Paleontology, the San Bernardino County Museum, or the San Diego Natural History Museum. Donation of the fossils shall be accompanied by financial support for initial specimen cataloguing and storage.	 Prior to Construction: N/A During Construction: N/A Following Construction: Fossils are deposited in a scientific institution with permanent paleontological collections 	N/A
MM CUL-08: Paleontological Mitigation Report (from 2013 RTRP EIR). A final summary report shall be completed that outlines the results of the paleontological mitigation program. This report shall be prepared under the supervision of a qualified paleontologist. The report will include a description and maps of the Project area; descriptions of paleontologically sensitive or fossiliferous sediments in the Project vicinity; discussions of the methods used during monitoring and during fossil recovery; descriptions and illustrations of the stratigraphic section(s) exposed, fossils collected, including taxonomic data; photographs of the locations of recovered fossils; an assessment of the significance of the recovered fossils; complete contextual data from the fossil locality, including sedimentology and taphonomy; and a record of accession of the fossils to the selected repository, including specimen numbers.	 Prior to Construction: N/A During Construction: N/A Following Construction: Preparation of a Paleontological Mitigation Report 	N/A
MM CUL-08A: Paleontological Mitigation Report Approval. A draft of the Paleontological Mitigation Report shall be submitted to the CPUC within 60 days of the close of construction for review and approval	 Prior to Construction: N/A During Construction: N/A Following Construction: SCE submits a draft Paleontological Mitigation Report to CPUC within 60 days following construction 	N/A
Geology and Soils		
EPE GEO-01: Conduct a Geotechnical Study and Incorporate Recommendations into Final Project Design. Prior to final design of the substations, substation upgrades, distribution line relocation, access roads, fiber optic line and Transmission/Subtransmission Line placement, a geotechnical study would be performed to identify site-specific soils and geologic conditions in enough detail to support final engineering. Recommendations from the geotechnical study would be incorporated into the final project design.	 Prior to Construction: Conduct Geotechnical Study to identify site-specific soils and geologic conditions and provide recommendations for final project design During Construction: N/A Following Construction: N/A 	The entire proposed 230-kV transmission alignment
EPE GEO-02: Implement Soil Erosion Protection Measures. Transmission line, substation construction and upgrades, access roads, distribution line relocation and fiber optic line construction would be performed in accordance with the soil erosion and water quality protection measures specified in the Construction SWPPP.	 Prior to Construction: N/A During Construction: Implement soil erosion protection measures Following Construction: N/A 	The entire proposed 230- kV transmission alignment
No MMs		

Environmental Protection Element/Mitigation Measure	Performance Standard and Timing	Location
Hazards and Hazardous Materials		
EPE HAZ-01: Health, Safety, and Emergency Response Procedures. Health and Safety Plan. A health and safety plan to address site-specific health and safety issues would be prepared and implemented. The plan would address emergency medical services and procedures, including specific emergency response and evacuation measures for project personnel. Hazardous Materials and Hazardous Waste Handling. A project-specific Hazardous Materials Management and Hazardous Waste Management Program would be developed prior to initiation of the project. Material Safety Data Sheets would be made available to all project workers. • Transport of Hazardous Materials: Transport of hazardous materials would be in compliance with USDOT, Caltrans and CHP regulations (Title 22 CCR, Division 4.5 and 49 CFR 261-263). Transporters of hazardous materials and waste are responsible for complying with all applicable laws, rules and regulations, including the acquisition of required shipping papers, package marking, labeling, transport vehicle placarding, training, and registrations. • Refueling stations would be located in designated areas where absorbent pads and trays would be available. The fuel tanks would also contain a lined area to ensure that accidental spillage does not occur. Hazardous materials, such as paints, solvents, and penetrants, would be kept in an approved locker or storage cabinet. Emergency Release Response Procedures. An Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to construction activities. All construction personnel, including environmental monitors, would be aware of state and federal emergency response reporting guidelines.	 Prior to Construction: Health and Safety Plan, Hazardous Materials Management and Hazardous Waste Management Program, and Emergency Response Plan shall be developed prior to initiation of the project During Construction: The Health and Safety Plan, Hazardous Materials Management and Hazardous Waste Management Program and Emergency Response Procedures Plan shall be implemented Following Construction: N/A 	The entire proposed 230-kV transmission alignment
EPE HAZ-02: Construction Soil Management. The Soil Management Plan would provide guidance for the proper handling, on site management, and disposal of impacted soil that might be encountered during construction activities. The plan would include practices that are consistent with the California Title 8 Occupational Safety and Health Administration (Cal-OSHA) regulations, as well as remediation standards that are protective of the planned use. In the event that potentially contaminated soils are encountered within the footprint of construction, soils would be tested and stockpiled. The Certified Unified Program Agency (CUPA) would determine whether further assessment is warranted.	 Prior to Construction: Prepare Soil Management Plan During Construction: Implement Soil Management Plan Following Construction: N/A 	The entire proposed 230-kV transmission alignment
 Spill Prevention, Control, and Countermeasure Plan (SPCC Plan): In accordance with Title 40 of the CRF, Part 112, an SPCC for proposed and/or expanded substations would be prepared. The plan would include engineered and operational methods for preventing, containing, and controlling potential releases, and provisions for safe cleanup and reporting. Hazardous Materials Business Plans (HMBPs): Prior to operation of new or expanded substations, an HMBP would be prepared or updated and submitted, in accordance with Chapter 6.95 of the CHSD, and Title 22 CCR. Storm Water Pollution Prevention Plan (SWPPP): A project-specific construction SWPPP would be prepared and implemented prior to the start of construction of the transmission lines and substations. 	 Prior to Construction: SPCC, HMBP and SWPPP Plans would be prepared prior to the start of construction During Construction: SPCC, HMBP and SWPPP Plans would be implemented Following Construction: N/A 	The entire proposed 230-kV transmission alignment
EPE HAZ-04: Worker Environmental Awareness Program. A WEAP would be prepared. All construction crews and contractors would be required to participate in WEAP training prior to starting work on the project. The WEAP would serve as a training program to provide workers with an overview of general environmental protection measures as dictated by current law and permits. It would clearly establish for construction workers the conditions they need to follow to keep the project in compliance with applicable laws.	 Prior to Construction: Prepare WEAP. All construction crews and contractors shall attend the training prior to starting work on the project. During Construction: All construction crews and contractors shall attend the training prior to starting work on the project. Following Construction: N/A 	N/A
MM HAZ-01: Appoint Trained Personnel for Hazardous Material Handling (from 2013 RTRP EIR). If potentially contaminated soil, water or groundwater is encountered during Project construction, construction activities shall stop in the area of the discovery and an OSHA-trained individual with a minimum of 40-hours of Hazardous Waste Operations and Emergency Response (HAZWOPER) worker training shall be responsible for collecting a sample of the suspected material(s). An SCE/RPU approved Health and Safety Officer shall review the laboratory data results from suspected contaminated material(s) and, if contamination is confirmed, that individual shall coordinate with the appropriate regulatory agency (Santa Ana RWQCB or local CUPA) to determine the level of worker protection and protocol for handling/disposal of specific hazardous materials. If it is determined that no contamination is present the Health and Safety Officer shall notify the construction contractor to resume construction in the area.	 Prior to Construction: N/A During Construction: 1) Stop construction activities if contaminated soil, water or groundwater is encountered; 2) A qualified HAZWORER worker collects a sample of the suspected material(s); 3) An approved Health and Safety office reviews the laboratory data results and coordinate with the appropriate regulatory agency if necessary Following Construction: N/A 	The entire proposed 230-kV transmission alignment

Environmental Protection Element/Mitigation Measure	Performance Standard and Timing	Location
MM HAZ-02: Document compliance with measures for encountering unknown contamination (from 2013 RTRP EIR). If evidence of soil or groundwater contamination is detectable by visual and/or olfactory observation during Project construction, a report documenting the exact contamination location, laboratory test results, actions taken, and recommended protection measures (if applicable) shall be submitted to SCE, RPU, and the CPUC for each incident. This report shall be submitted within 30 days of SCE's/RPU's receipt of laboratory results.	 Prior to Construction: N/A During Construction: Document encountering of unknown contamination, and submit documentation to SCE, RPU, and the CPUC within 30 days of SCE'S/RPU's receipt of laboratory results Following Construction: N/A 	N/A
MM HAZ-03: Fire Prevention and Management Plan (from 2013 RTRP EIR).	Prior to Construction: 1) Develop a Fire Prevention and Management Plant 2) Advise construction and provide the single pr	N/A
A fire prevention and management plan shall be developed and applicable fire laws and regulations would be observed during the construction period. All construction personnel would be advised of their responsibilities under the applicable fire laws and regulations.	Plan; 2) Advise construction personnel of their responsibilities under the applicable fire laws and regulations • During Construction: Implement Fire Prevention and Management Pan • Following Construction: N/A	
The Fire Prevention and Management Plan would ensure uniform guidelines for prevention, control, and extinguishment of fires that could potentially occur during transmission line construction. It would identify firefighting and reporting tools and equipment for construction-related use of diesel and gasoline operated engines, welders, heavy construction operating equipment, and tractor dozers. It would identify Proposed Project-specific fire prevention measures, such as permits required, smoking and fire rules, storage and parking areas, welding, and emergency measures.		
MM HAZ-04: Uncover Existing Utility Pipelines. SCE shall excavate "potholes" over the top of any buried existing utilities, including pipelines, that are located within 10 feet of a proposed excavation (e.g., pole foundation, retaining wall footing, duct bank, or vault structure) to verify the location of the existing utility prior to initiating excavation work. Potholing work shall be performed using a non-destructive method (e.g., air vacuum extraction) that will not damage an existing pipeline once it is encountered. Potholing work shall be conducted under the oversight of a representative of the appropriate utility company. Potholing shall reveal the top of the pipeline only and shall not go any deeper than the top of the pipe so as to not damage the pipe in any way. More than one pothole may be excavated where necessary to verify the orientation of the existing pipeline relative to the proposed excavation. Potholes shall be backfilled with removed stockpiled soil once the location and orientation of the pipeline has been verified and marked. The utility company representative shall verify and approve that backfill and compaction of the potholes has been performed adequately. If the pipeline is located within the footprint of a proposed pole foundation, no pole foundation excavation work shall commence until CPUC has been notified and the pole location has been relocated sufficiently far away from the buried pipeline.	 Prior to Construction: (1) Verify and mark location of buried existing utilities located within 10 feet of excavation area, (2) Receive verification from utility company, (3) Excavate potholes to confirm existing underground utility location, (4) Relocate pole location away from buried pipeline when necessary During Construction: N/A Following Construction: N/A 	All work areas included in the CPCN where excavations and trenching would occur

Environmental Protection Element/Mitigation Measure	Performance Standard and Timing	Location
MM HAZ-05: Induced Voltage Touch Study. SCE shall identify both aboveground and underground objects (e.g., metal fences or buried metal utility lines such as pipelines or metallic communication conductors, etc.) in the vicinity of the Proposed Project that may potentially present a shock hazard to the public or workers of any adjacent metallic utility lines, due to induced currents or voltages. The owner of any adjacent metallic utility lines shall be identified about the Proposed Project. SCE shall acquire as-built documents or other facility location information from adjacent utility owners to evaluate the location and specifics of nearby metallic objects. SCE shall also obtain information/documentation from adjacent utility owners defining any quantitative hazardous shock thresholds for both public and worker exposures applicable to their facilities. In the absence of more stringent hazardous shock thresholds from adjacent utility owners, SCE shall ensure that induced voltage does not exceed 25 volts to ground under normal and emergency operating conditions in accordance with any other quantitative SCE public and worker safety standards. SCE shall prepare an Induced Voltage Touch study that evaluates the conductive and inductive interference effects of the Proposed Project components on the identified objects. The Induced Voltage Touch study shall model the conductive objects using the maximum anticipated voltage and/or current for the proposed 230-kV line under normal and emergency operating conditions and shall consider the construction details for the transmission line. The study shall also construct a model using fault conditions if such faults would result in higher voltages or currents on the Proposed Project facilities and higher induced voltages on adjacent metallic utility lines from hazardous shocks. The Induced Voltage Touch study shall include the model voltage of a conductive objects prior to implementation of grounding or other measures sCE shall give any affected utility owner a copy of the	 Prior to Construction: (1) Induced Voltage Touch study and model are submitted to CPUC at least 60 days prior to start of construction for approval, (2) Safety devices (i.e., traveling grounds, guard structures, and radio-equipped public safety roving vehicles and linemen) are in place prior to initiation of wire-stringing activities During Construction: Ensure that all required grounding or other appropriate measures are implemented Following Construction: Address any safety concerns and document corrective action 	The entire proposed 230-kV transmission alignment
Hydrology and Water Quality		
EPE HYDRO-01: Jurisdictional Waters. Infrastructure associated with the Proposed Project would be situated outside jurisdictional waters, as defined by the Clean Water Act (e.g., wetlands, stream channels and banks). The Proposed Project has been designed to span and avoid wetlands and riparian areas. Work limits for tower construction, tower footprints, and pull and tension sites would be in upland locations. There is no dredge or fill action expected from construction of the Proposed Project. If jurisdictional waters cannot be avoided, a Section 404 Nationwide 12 Permit will be obtained from the USACE and impacts to jurisdictional waters will be restricted to a total area of no more than 0.5 acre, as mandated by Permit requirements. All permit conditions will be followed to ensure that impacts remain less than significant.	 Prior to Construction: 1) Define work limits for construction activities; 2) Obtain necessary permits; During Construction: Follow permit conditions Following Construction: N/A 	All Proposed Project work areas where jurisdictional waters would occur
EPE HYDRO-02: Transmission Operations & Maintenance . Areas that do not offer perpetual access to transmission structures for routine operations and maintenance shall be avoided.	 Prior to Construction: N/A During Construction: Avoid transmission structures with no perpetual access Following Construction: Avoid transmission structures with no perpetual access 	All transmission structures with no perpetual access
EPE HYDRO-03: Dewatering Operations. If groundwater is encountered during construction as indicated by geologic borings, dewatering operations, as described in the construction SWPPP, shall be implemented. Groundwater shall not be discharged to storm drains or to Waters of the U.S., and shall be contained within the work area, using standard stormwater BMPs (e.g., straw wattles) and allowed to percolate back to the ground.	 Prior to Construction: N/A During Construction: When groundwater is encountered during trench and vault installation Following Construction: N/A 	All Proposed Project work areas where excavations and trenching would occur

Environmental Protection Element/Mitigation Measure	Performance Standard and Timing	Location
EPE HYDRO-04: Maintaining Natural Drainage Patterns. The substations and poles shall be designed and engineered to facilitate natural drainage patterns to minimize or avoid any potential impacts to erosion and siltation.	 Prior to Construction: Design and engineer substations and poles to facilitate natural drainage patterns During Construction: N/A Following Construction: N/A 	All substations and poles
EPE HYDRO-05: New Impervious Areas Returned to Existing Conditions. New impervious areas associated with temporary construction would be returned to preconstruction conditions after the completion of project construction.	 Prior to Construction: N/A During Construction: N/A Following Construction: New impervious areas associated with temporary construction would be returned to preconstruction conditions 	All temporary construction areas with new impervious surface
Land Use and Planning		
No EPEs		
No MMs		
Mineral Resources		
No EPEs		
No MMs		
Noise		
EPE NOI-01 Noise Complaint Reporting. The project (via construction contractor) would establish a telephone hot-line for use by the public to report any perceived significant adverse noise conditions associated with the construction of the project. If the telephone is not staffed 24 hours per day, the contractor would include an automatic answering feature, with date and time stamp recording, to answer calls when the phone is unattended. This hot-line telephone number would be posted at the project site during construction in a manner visible to passersby. This telephone number would be maintained until the project has been considered commissioned and ready for operation.	 Prior to Construction: N/A During Construction: The construction contractor shall establish a telephone hot-line for construction-related complaints Following Construction: N/A 	All Proposed Project locations
EPE NOI-02 Noise Complaint Investigation. Throughout the construction of the project, the contractor would document, investigate, evaluate, and attempt to resolve all project-related noise complaints. The contractor or its authorized agent would: Use a Noise Complaint Resolution Form to document and respond to each noise complaint; Contact the person(s) making the noise complaint within 24 hours; Conduct an investigation to attempt to determine the source of noise related to the complaint; and Take all reasonable measures to reduce the noise at its source.	 Prior to Construction: N/A During Construction: Construction-related complaints will be investigated and responded to within 24 hours Following Construction: N/A 	All Proposed Project locations
 EPE NOI-03 Construction Practices. The following are typical field techniques for reducing noise from construction activities on a project site, with the purpose of reducing aggregate construction noise levels at nearby noise sensitive receptors: To the extent practical and unless safety provisions require otherwise, adjust all audible back-up alarms downward in sound level, reflecting vicinities that have expected lower background level, while still maintaining adequate signal-to-noise ratio for alarm effectiveness. Consider signal persons, strobe lights, or alternative safety equipment and/or processes as allowed, for reducing reliance on high-amplitude sonic alarms. As practical and observing safety considerations, place stationary construction noise sources that tend to operate continuously and/or for extended periods of time, such as generators and air compressors, as far away as possible from potentially affected noise sensitive receptors. Place non-noise-producing mobile equipment such as trailers in the direct sound pathways between suspected major noise-producing sources and sensitive receptors. Limit mobile construction equipment or vehicle engine idling duration, so that such continuous sources of noise do not unnecessarily contribute to an 	 Prior to Construction: N/A During Construction: Implement noise-reducing construction activity practices Following Construction: N/A 	All Proposed Project locations where high- noise-generating equipment is used

Environmental Protection Element/Mitigation Measure	Performance Standard and Timing	Location
 EPE NOI-04 Noise Reduction Practices. The following are typical practices for construction equipment selection (or preferences) and expected function that can help reduce noise. Pneumatic impact tools and equipment used at the construction site would have intake and exhaust mufflers recommended by the manufacturers thereof, to meet relevant noise limitations. Provide impact noise producing equipment (i.e., jackhammers and pavement breaker[s]) with noise attenuating shields, shrouds or portable barriers or enclosures, to reduce operating noise. Line or cover hoppers, storage bins, and chutes with sound-deadening material (e.g., apply wood or rubber liners to metal bin impact surfaces). Provide upgraded mufflers, acoustical lining, or acoustical paneling for other noisy equipment, including internal combustion engines. Use alternative procedures of construction and select a combination of techniques that generate the least overall noise and vibration. Use construction equipment manufactured or modified to reduce noise and vibration emissions, such as: Electric instead of diesel-powered equipment. Hydraulic tools instead of pneumatic tools. Electric saws instead of air- or gasoline-driven saws. 	 Prior to Construction: N/A During Construction: Implement construction equipment practices to reduce noise Following Construction: N/A 	All Proposed Project locations where high- noise-generating equipment is used
EPE NOI-05 After-Hours Construction. In the event construction activities are considered necessary on days or hours outside of what is specified by noise ordinance, SCE would provide advanced notification (as required by ordinance or as agreed upon with the local jurisdiction) of such anticipated activity to the CPUC, the local municipality or County where anticipated work is to be performed, and to residents within 300 feet of the anticipated work. This notification would include a general description of the work to be performed, location, and hours of construction anticipated. Additionally, SCE or its contractors would route all construction traffic and/or helicopter flight(s) away from residences, schools and recreational facilities to the maximum extent feasible.	 Prior to Construction: N/A During Construction: Provide advanced notification when construction activity is required outside of hours specified on noise ordinances Following Construction: N/A 	All Proposed Project locations
MM NOI-01: High-Noise-Generating Equipment. SCE shall implement typical noise-reducing construction practices as identified in EPE NOI-03 and EPE NOI-4 to reduce noise levels when working within 100 feet of receptors. If high-noise-generating equipment must be used, SCE shall limit the use of high-noise-generating equipment to between the hours of 9:00 am and 3:00 pm when constructing within 100 feet of receptors in the City of Jurupa Valley. High-noise-generating equipment shall be defined as any piece of equipment that generates a maximum (L _{max}) noise level of 85 dBA or greater at a reference distance of 50 feet from a sensitive receptor where noise mitigating structures (such as sound walls) do not exist. The following equipment have been identified as high-noise-generating equipment: • Clam shovel • Concrete saw • Jackhammer • Hydra break ram • Pile driver • Vacuum excavator	 Prior to Construction: N/A During Construction: Limit high-noise-generating equipment use in Jurupa Valley to between 9:00 am and 3:00 pm Following Construction: N/A 	All Project locations within the City of Jurupa Valley where high-noise- generating equipment is used within 100 feet of residences
MM NOI-02: Additional Noise Reduction. SCE shall plan all construction activities with the potential to exceed the City-identified noise ordinance limits within 300 feet of receptors, including concrete pours, such that they are completed by 6:00 pm in Jurupa Valley and 7:00 pm in Riverside to avoid conflicts with local jurisdiction noise ordinances. SCE shall implement all available noise reduction techniques identified in EPEs NOI-03 and NOI-04 in construction areas within 300 feet of sensitive receptors (residences and schools) to reduce noise levels at the receptors. Construction meetings, site setup or cleanup activities that occur outside of City-identified construction hours must meet the noise ordinance limits (measured at receptors) of 55 dBA between 7:00 am and 10:00 pm and 45 dBA between 10:00 pm and 7:00 am.	 Prior to Construction: N/A During Construction: Apply noise reduction measures Following Construction: N/A 	All Project locations included in the CPCN that are within 300 feet of a sensitive receptor
 MM NOI-03: Trench Plate Noise Reduction. SCE shall implement techniques to reduce noise generated by vehicle traffic over temporary trench plates. These echniques shall include one or more of the following, as necessary: Implement traffic calming measures to reduce vehicle speeds Ensure trench plates are appropriately secured 	 Prior to Construction: N/A During Construction: Apply trench plate noise reduction measures Following Construction: N/A 	All Project locations included in the CPCN where temporary trench plates are used

• Utilize trench plates of a low noise-generating material

Environmental Protection Element/Mitigation Measure	Performance Standard and Timing	Location
MM NOI-04: Construction Notification. SCE shall provide notice by mail at least 1 week prior to construction activities to all sensitive receptors and residences within 500 feet of all construction. The announcement shall state where and when project construction will occur and provide tips on reducing noise intrusion, for example, by closing windows facing the planned construction. Notices shall also include the phone number for the noise complaint telephone hot-line described in EPE NOI-1.	 Prior to Construction: Post and mail notices at least 1 week prior to construction activities During Construction: N/A Following Construction: N/A 	Sensitive receptors and residences within 500 feet of construction activities for project elements included in the CPCN.
Population and Housing		
No EPEs		
No MMs		
Recreation		
EPE REC-01: Recreational Area Restrictions . In the event of short-term restriction on recreation use at parks, or on existing bike lanes, bike paths, or trails are necessary during project construction, the public would be notified in coordination with the agencies that manage the impacted resource.	 Prior to Construction: N/A During Construction: Public and managing agencies are notified regarding restriction to use of recreation facilities Following Construction: N/A 	Recreation areas within the Proposed Project area
EPE REC-02: Closure Notices. When temporary park or trail closures are necessary, on-site notices would be posted prior to the closure.	 Prior to Construction: N/A During Construction: On-site notices posted prior to closures of recreation facilities Following Construction: N/A 	Recreation areas within the Proposed Project area
EPE REC-03: Revegetation. Any park areas temporarily affected by project construction would be revegetated and returned to preconstruction conditions.	 Prior to Construction: N/A During Construction: N/A Following Construction: Revegetate affected recreation facilities 	Recreation areas within the Proposed Project area
MM REC-01: Recreation Area Closures (from 2013 RTRP EIR). When temporary short-term closures to recreational areas are necessary for construction activities, closures would be coordinated with recreational facility owners. Schedule construction activities to avoid heavy recreational use periods (e.g., holidays or tournaments). Post notices prior to the closure.	 Prior to Construction: SCE coordinates with facility owners and posts notices prior to closure During Construction: SCE coordinates with facility owners and posts notices prior to closure Following Construction: N/A 	Goose Creek Golf Club
MM REC-02: Conversion of Land and Water Conservation Fund (LWCF) Property [Section 6(f)] (from 2013 RTRP EIR). Where a conversion of LWCF property would occur, coordinate with the National Park Service, California State Parks- Office of Grants and Local Services, and the grantee to replace the property used by the Proposed Project in size, value and function through a conversion process.	 Prior to Construction: Applicant pays fees levied and provide payment confirmation During Construction: N/A Following Construction: N/A 	All Proposed Project locations where conversion of LWCF property would occur
MM REC-03: Maintain Access to Trails and Parks. SCE shall identify existing alternate routes to allow park, trail, and path users to access parks or alternate trail segments for those areas that are inaccessible or closed due to construction activities. Trail detours must be located on existing trails or unvegetated areas and shall not be located where they could impact sensitive biological resources. Trail detours may be placed, when feasible and safe to do so, along the perimeter of active work areas or through inactive work areas when it is safe to do so. SCE shall propose alternate routes delineated on project plans and provided to the CPUC at least 30 days prior to construction for review and approval. Signs shall be posted at trail entrances to inform trail users of construction activities that may be encountered, such as excavations, and vehicles and equipment on trails.	 Prior to Construction: Submittal of proposed alternative park, trail, and bike path routes to CPUC for review and approval at least 30 days prior to construction During Construction: SCE installs and maintains signs informing trail users of detours or closures Following Construction: N/A 	Project construction work and staging areas at 68th Street and Lucretia Avenue, 68th Street and Dana Avenue, Limonite Avenue and Pats Ranch Road, Landon Drive and Wineville Avenue, and at Distribution Line Relocations #7 and #8

Environmental Protection Element/Mitigation Measure	Performance Standard and Timing	Location
MM REC-04: Trail and Recreation Area Conditions and Repairs. SCE shall prepare a Pre-Project Trail and Recreation Area Condition Report prior to construction that documents the condition of designated trails, proposed detour routes, and recreational areas located within Revised Project work areas. The Pre-Project Trail and Recreation Area Condition Report shall be submitted to the CPUC no less than 30 days before construction. SCE shall repair all damage to trails, detour routes, and recreation areas caused by construction vehicles and equipment within 30-days after completion of construction. SCE shall prepare a Post-Project Trail and Recreation Area Condition Report documenting the final state of all trails and recreation areas within the Revised Project work areas. The Post-Project Trail and Recreation Area Condition Report shall be submitted to the CPUC within 60 days of completing construction in each project segment. SCE shall complete all trail and recreation area repairs to the approval of the appropriate land owner, land agency, or city. SCE shall provide copies of the approval to the CPUC. SCE shall restore all LWCF land to pre-existing conditions within 12 months from the start of construction.	 Prior to Construction: SCE submits a Pre-Project Trail and Recreation Area Condition Report to the CPUC 30 days before construction During Construction: Trail and recreation area damage is adequately repaired within 12 months from start of construction Following Construction: SCE submits a Post-Project Trail and Recreation Area Conditions Report to the CPUC within 60 days of completing construction 	Project construction areas at 68th Street and Lucretia Avenue, 68th Street and Dana Avenue, Limonite Avenue and Pats Ranch Road, Landon Drive and Wineville Avenue, at Distribution Line Relocations #7 and #8, and Goose Creek Golf Club
MM REC-05: Maintain Access to Equestrian Trails. SCE shall maintain access to primary and secondary equestrian trails within the Equestrian Lifestyle Protection Overlay. Where closure of equestrian trails is necessary, SCE shall provide detours and appropriate signage to notify users of construction activities.	 Prior to Construction: N/A During Construction: SCE maintains access to equestrian trails and posts signage as needed Following Construction: N/A 	68th Street between Limonite Avenue and Lucretia Avenue
Transportation and Traffic		
EPE TRANS-01: Minimize Street Use. Construction activities would be designed to minimize work on, or use of, local streets.	 Prior to Construction: N/A During Construction: Minimize construction activity on local streets Following Construction: N/A 	Proposed Project alignment
EPE TRANS-02: Incorporate Protective Measures. Any construction or installation work requiring the crossing of a local street, highway, or rail line would incorporate the use of guard poles, netting, or similar means to protect moving traffic and structures from the activity. If necessary to ensure the safety of construction crews and the traveling public on state highways, continuous traffic breaks operated by the California Highway Patrol would be planned and provided.	 Prior to Construction: N/A During Construction: Incorporate the use of protective measures when construction or installation crosses streets, highways or rail lines Following Construction: N/A 	Proposed Project alignment
EPE TRANS-03: Prepare Traffic Control Plans. Traffic control and other management plans would be prepared to minimize project impacts on local streets. Traffic control and other management plans would be prepared to minimize proposed project impacts on local streets and bike lanes, railroad operations (Union Pacific, Metrolink), emergency services, transit bus operations, recreation facilities, school bus operations and other planned roadway projects. The plans would be developed in collaboration with the responsible agencies of these transportation modes, programs, and projects. The plans will include provisions to accommodate emergency response vehicles at all times, such as immediately stopping work for emergency vehicle passage, short detours, and alternate routes.	 Prior to Construction: Prepare Traffic Management Plans During Construction: Implement Traffic Management Plans Following Construction: N/A 	Proposed Project alignment
EPE TRANS-04: Repair Damaged Streets. Any damage to local streets caused as a result of project construction would be repaired and restored to preconstruction conditions.	 Prior to Construction: N/A During Construction: N/A Following Construction: Repair damage to local streets caused by construction 	Proposed Project alignment
MM TRANS-01: Maintain Access (from 2013 RTRP EIR). Arterials, straight alignments; residential streets, roadway with specific access need (fire station, hospital/medical facility, school bus) - Provide construction closures that keep at least one lane of traffic open in each direction of travel at all times, or provide adequate lane capacity to generally provide a good level of service (maintain within bounds of current level of service) in traffic operations.	 Prior to Construction: Post construction closures notices prior to road closures During Construction: Maintain at least one lane of traffic open in each direction of travel Following Construction: N/A 	Arterial, straight alignments, residential streets, roadways with specific access need
MM TRANS-02: Avoid Peak-Period Construction (from 2013 RTRP EIR). To minimize traffic congestion and delays during construction, RPU and SCE shall restrict all necessary lane closures or obstructions on major roadways (i.e., Congestion Management Plan roadways) associated with project construction activities to off-peak periods. Lane closures shall be avoided during the 6:00 a.m. to 9:00 a.m. timeframe and the 3:30 to 6:30 p.m. timeframe, or as otherwise defined within the TMPs.	 Prior to Construction: N/A During Construction: Restrict lane closures and other obstructions on CMP roadways to off-peak periods Following Construction: N/A 	Construction of the underground 230-kV transmission line within Limonite Avenue

Environmental Protection Element/Mitigation Measure	Performance Standard and Timing	Location
MM TRANS-02A: Avoid Peak-Period Closures and Obstructions on All Roadways. To minimize traffic congestion and delays during construction of the underground 230-kV transmission line, SCE shall schedule all necessary road or lane closures or obstructions on all roadways associated with project construction activities during off-peak periods. Road and lane closures shall be avoided during the 6:00 a.m. to 9:00 a.m. timeframe and the 3:30 to 6:30 p.m. timeframe, or as otherwise defined within CPUC and City-approved traffic control plans.	 Prior to Construction: N/A During Construction: Restrict road and lane closures and other obstructions on all roads to off-peak periods Following Construction: N/A 	Construction of the underground 230-kV transmission line
MM TRANS-03: Minimize Roadway Closures (from 2013 RTRP EIR). Construction activities shall be designed to minimize work on, or use of, roadways crossed by the project corridor(s). This would be accomplished through limiting construction vehicle and equipment operations to identified disturbance sites (pad areas, access roads and staging areas) and by maintaining sock lines and conductors well above roadways during stringing operations.	 Prior to Construction: N/A During Construction: 1) Limit construction vehicle and equipment operations to identified disturbance sites; 2) Maintain sock lines and conductors well above roadways during stringing Following Construction: N/A 	All roadways crossed by the project corridors
MM TRANS-04: Bus Transit Route (from 2013 RTRP EIR). Provide construction closures that keep at least one lane of traffic open with reversible flow (via flagmen) during times of transit line operation, unless an adequate detour route can be found within 0.25 mile of the closure point.	 Prior to Construction: N/A During Construction: (1) Maintain one lane of traffic open with reversible flow, or (2) Provide an adequate detour route within 0.25 mile Following Construction: N/A 	Underground 230-kV transmission line alignment along bus routes
MM TRANS-05: Roadway with Class I or Class II Bicycle Facility (from 2013 RTRP EIR). Provide construction closures that allow for continued bicycle access within the existing facilities during all times, or provide a safe diversion of the bicycle facility around the construction zone.	 Prior to Construction: N/A During Construction: (1) Either permit bicycle access through Pats Ranch Road/ Limonite Avenue during lane closures crossing this intersection, or (2) Provide a safe diversion of the bicycle facility around the construction zone Following Construction: N/A 	Limonite Avenue approaching the intersection with Pats Ranch Road from the west
MM TRANS-06: Prepare Traffic Control Plans. Prior to the start of construction, SCE shall prepare and submit Motorized and Non-Motorized Traffic Control Plans (TCPs) to the CPUC for review and approval at least 60 days prior to commencing construction activities. The plans shall be prepared in consultation with all agencies with jurisdiction (e.g., City of Jurupa Valley) over public roads that would be directly affected by construction activities (where road closures or encroachments would be necessary). At a minimum, the TCPs shall include the following details and traffic control measures: • Lane and Road Closures — Details regarding the locations and timing of all temporary road and lane closures.	 Prior to Construction: (1) Prepare Motorized and Non-Motorized TCPs, (2) Submit TCPs to the CPUC and City of Jurupa Valley During Construction: Implement the traffic control measures detailed in the TCPs Following Construction: N/A 	Underground 230-kV transmission line construction work areas and traffic routes
 Implement standard safety practices, including installation of appropriate barriers between work zones and transportation facilities, placement of appropriate signage, cones, and use of traffic control devices. Designate traffic detours for any road or lane closures with appropriate signage marking the detours. Construction Traffic 		

- Time worker commutes and material deliveries to avoid peak (AM and PM) commuting hours.
- Workers shall carpool to and from work sites and Etiwanda Marshalling Yard.
- Plans for construction worker parking and transportation to work sites.

• Traffic Safety

- Use flaggers and/or signage to guide vehicles through or around construction zones using proper techniques for construction activities including staging yard entrance and exit.
- Store all equipment and materials in designated work areas in a manner that minimizes traffic obstructions and maximizes sign visibility.
- Limit vehicles to safe speed levels according to posted speed limits, road conditions, and weather conditions.
- Route trucks to avoid minor roads, where possible, to reduce congestion and potential asphalt damage.

• Encroachment Permit

- Abide by encroachment permit conditions, which shall supersede conflicting provisions in the TCP.

Notification

Environmental Protection Element/Mitigation Measure	Performance Standard and Timing	Location
 SCE shall notify local emergency personnel (i.e., fire departments, police departments, ambulance, and paramedic services), residents within 300 feet, and schools providing school bus service in the area (i.e., Troth Elementary and Louis Vandermolen Fundamental Elementary) at least 7 days prior to lane or road closures. The notice shall include location(s), date(s), time(s), and duration of closure(s), and a contact number for SCE project personnel. Access 		
 Emergency access procedures shall be defined. SCE shall be ready at all times to accommodate emergency vehicles by immediately stopping work for emergency vehicle passage, providing short detours, or providing alternate routes developed in conjunction with local agencies. 		
 SCE shall maintain travel through intersections at all times during construction, operation, and maintenance. SCE or its construction contractors shall provide the ability to lay a temporary steel plate trench bridge upon request of the property owner in order to ensure reasonable driveway access to businesses and residences adjacent to work areas during construction hours, and shall provide continuous access to adjacent properties when not actively constructing the underground 230-kV transmission line. In the event of an emergency, steel plating shall be placed over underground work areas and vehicles/equipment shall be removed from the partially or fully closed roadways to the greatest extent feasible, as needed, to permit uninterrupted traffic flow. SCE or its construction contractor shall designate a job site manager responsible for ensuring emergency access. All workers shall be trained in emergency access procedures. 		
MM TRANS-07: Post-Construction Road and Sidewalk Repair. SCE shall conduct a pre-construction road and sidewalk condition assessment along roadways and sidewalks along the underground alignment and construction traffic routes, prior to construction. The pre-construction road and sidewalk condition assessment shall include photographs or a video recording along the construction route public roads within 500 feet in each direction of project access points and roadways where the road surface would be damaged by project-related trenching and digging. SCE shall submit the pre-construction road and sidewalk condition assessment to the CPUC and the City of Jurupa Valley no less than 30 days prior to construction. Following construction, SCE shall conduct a post-construction road and sidewalk condition assessment along 68th Street, Pats Ranch Road, Limonite Avenue, Wineville Avenue, Cantu-Galleano Ranch Road, and Etiwanda Avenue. If damage to roads occurs as a result of project construction or construction traffic, SCE shall restore damaged roadways and sidewalk (e.g., asphalt, curbs, and gutters) within 60 days after the completion of construction to a pre-construction condition, based on the pre-construction road and sidewalk condition assessment, or to a condition agreed upon by SCE and the roadway owner, at their own expense.	 Prior to Construction: Submit pre-construction road and sidewalk condition assessment covering applicable roadways to the CPUC and the City of Jurupa Valley no less than 30 days prior to construction During Construction: N/A Following Construction: (1) Conduct a post-construction road and sidewalk condition assessment along applicable roadways, (2) If damage is found, repair of damaged roadways and sidewalks will occur within 60 days of completion 	Underground 230-kV transmission line construction work areas and traffic routes
 MM TRANS-08: Public Transit, Bicycle, Equestrian, and Pedestrian Facilities. The following measures shall be implemented during construction, operation and maintenance of the underground 230-kV transmission line: SCE shall coordinate with Riverside Transit Authority to re-locate bus stops and/or re-route affected transit services via parallel streets during construction when affected transit service is subject to delays resulting from partial street closure or inaccessible transit stops due to full street closure. SCE shall post signs at the affected bus stops on Pats Ranch Road and Limonite Avenue. The signs shall be posted at least 2 weeks in advance of road or lane closures and shall indicate when the bus stops along Pats Ranch Road or Limonite Avenue would be unavailable and where the nearest bus stop for RTA bus lines 29 or 3 is located. SCE shall post signs at pedestrian/equestrian intersections at least 2 weeks in advance of construction that are anticipated to be affected by closures and/or detours. These signs shall state the date range of construction and shall indicate the route of pedestrian/equestrian detours during construction. Warning signs shall be posted on sidewalks/trails where construction limits pedestrian/equestrian access and to identify which side of the street can be safely accessed at intersections prior to construction zones. SCE or its construction contractors shall use "share the road" signs within the construction zones where partial closures would occur; obtain a temporary permit to allow bicyclists to use the sidewalks to bypass the construction zones where allowed by the local jurisdiction; and provide clear signs using the bicycle symbol to guide bicyclists to detour routes. 	 Prior to Construction: (1) Coordinate with the Riverside Transit Authority to re-locate bus stops and/or re-route affected transit services, (2) Post signs 2 weeks prior to construction, at bus stops and pedestrian/equestrian intersections that will be affected by closures and/or detours, (3) Notices will provide information regarding the duration of closure and detour/alternate routes, (4) Obtain a permit, if feasible, to allow bicyclists to use sidewalks to bypass construction areas During Construction: (1) Erect "share the road" signs within construction zones where partial closures will occur, (2) Post signs informing pedestrians/equestrians of upcoming areas with limited pedestrian/equestrian access to permit safe crossing at intersections Following Construction: N/A 	Underground 230-kV transmission line alignment
Public Services and Utilities		
EPE UTIL-01: Disposal of Construction Waste Material. Recyclable construction waste materials shall be recycled. Non-recyclable waste materials shall be categorized and disposed of at a licensed location.	 Prior to Construction: N/A During Construction: Recycle construction materials; categorize and dispose of non-recyclable waste materials at a licensed location Following Construction: N/A 	Proposed Project alignment
EPE UTIL-02: Irrigation. Substation landscaping shall be planted in accordance with a landscaping and irrigation plan. The plan shall incorporate the use of drought tolerant, low maintenance and, to the extent possible, native plants to conserve water. This EPE does not address revegetation requirements from ground disturbance associated with temporary work areas as set forth in other EPEs or mitigation measures elsewhere in this DEIR (2013 RTRP EIR).	 Prior to Construction: Prepare a Landscaping and Irrigation Plan During Construction: Implement Landscaping and Irrigation Plan Following Construction: N/A 	Substations

Environmental Protection Element/Mitigation Measure	Performance Standard and Timing	Location
MM UTIL-01: Notify Utility Companies and Adjust Underground Work Locations. SCE shall notify all utility companies with utilities located within or crossing SCE ROW and franchise agreement areas to locate and mark existing underground utilities along the entire length of the overhead and underground 230-kV transmission line alignments at least 30 days prior to construction. No subsurface work shall be conducted that would conflict with (i.e., directly impact or compromise the integrity of) a buried utility. Conflicts shall be identified and addressed with the affected utility during final engineering. In the event of a conflict, the Project alignment shall be realigned vertically and/or horizontally, as appropriate, to avoid other utilities and provide adequate operational and safety buffering. SCE shall provide CPUC with documentation of contact and response from the utility companies prior to construction. SCE shall also provide documentation of any changes in the Project alignment for review and approval at least 30 days prior to construction.	 Prior to Construction: (1) SCE notifies utility companies at least 30 days prior to construction, (2) Existing underground utilities are marked within the Project alignment, (3) SCE provides CPUC with documentation of contact and response from the utility companies, and documentation of any changes in the Project alignment During Construction: Underground utilities are avoided, and the integrity of existing underground utilities is maintained Following Construction: N/A 	Project transmission line alignments included in the CPCN.
MM UTIL-02: Public Notification of Utility Service Interruption. Prior to construction in which a utility distribution service interruption is known to be unavoidable, SCE shall notify members of the public affected by the planned outage at least 10 calendar days prior to the impending interruption for residential and commercial outages. Copies of the notices and dates shall be provided to the CPUC at the time the notices are distributed to the public. In the event of an unforeseen utility service disruption, SCE shall immediately notify the CPUC and affected utility company/companies to determine appropriate actions.	 Prior to Construction: N/A During Construction: SCE notifies members of the public and the CPUC at least 10 days prior to pending service interruption Following Construction: N/A 	Project overhead and underground alignments included in the CPCN.
MM UTIL-03: Cathodic Protection. During final engineering SCE shall determine and report to CPUC the location of adjacent utilities. If SCE identifies utilities in proximity of the 230-kV transmission line that may be susceptible to corrosion due to induced currents or voltages, SCE shall conduct an alternating current interference study that evaluates the alternating current interference effects of the proposed 230-kV transmission line on nearby parallel metallic pipelines. The study shall include the development of a model using the maximum anticipated voltage for the proposed transmission line and shall consider the construction specifications for the transmission line, including conductor arrangement. For all utilities identified with a corrosion potential, SCE shall coordinate with the owner of the utility and use data gathered in the alternating current interference study to determine appropriate design measures to protect the pipeline from corrosion, such as ground mats or gradient control wires for cathodic protection of the buried utility pipelines. The study, summary of coordination with potentially affected utilities, and specifications of any design measures to be installed shall be submitted to the CPUC for review and approval at least 60 days prior to initiation of construction. If there are no utilities identified with a corrosion potential, as verified by the CPUC, no alternating current interference study or cathodic protection mitigation is required.	 Prior to Construction: Interference Study Report shall be submitted to the CPUC 60 days prior to construction During Construction: SCE coordinates with the owner of the utility to implement appropriate design measures Following Construction: N/A 	Project underground alignment included in the CPCN.
Note: Changes marked in red have been made to clarify EPEs and MMs from the 2013 RTRP EIR and Final Subsequent EIR.		

Appendix C Summary Tracking Tables

Table C-1 Permits and Authorizations Tracking

Permit/Authorization	Purpose and Authority	Requirement	Timing and Submittal Requirements	Review/Co	ordination ^a	Status/Notes
		Sources		Submitted	Approved	
			Required Prior to All Construction Activities			
CPUC Certificate of Public Convenience and Necessity (CPCN)	CPUC authorization to construct the project CPUC General Order (GO) 131-D, Section III.B	GO 131-D	SCE obtained a CPCN from CPUC (as issued through the CPUC Proceeding Decision).	SCE : March 12, 2020	CPUC : March 12, 2020	Approved
			*SCE shall submit any requests for Minor Project Refinements (MPRs) or Petitions for Modification (PFMs), as needed, prior to deviating from the CPUC-approved project .	*CPUC: TBD	*CPUC: TBD	TBD
City of Jurupa Valley Superior Easement	Construction activities of permanent utilities within City of Jurupa Valley roadways	CPUC Decision 20-03-001	SCE shall acquire the superior easement and provide a copy to CPUC prior to construction commencement	City: Pending CPUC: Pending	City: Pending CPUC: Pending	Pending
State Water Resources Control Board (SWRCB) General Permit	Permit for discharging stormwater associated with construction and land disturbance activities of one acre or more Order No. 2009-0009-DWQ, as amended by	MMCRP	SCE shall submit Permit Registration Documents (PRDs) (e.g., Notice of Intent [NOI], etc.) once obtained from the SWRCB.	SWRCB: Pending CPUC: Pending	SWRCB: Pending CPUC: N/A	Pending
	2010-0014-DWQ and 2012-0006-DWQ The General NPDES Permit requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) (refer to Table C-2)		SCE shall submit all Notice of Termination (NOT) forms to CPUC once SWPPP requirements have been met and permit coverage has ended.	SWRCB: Pending CPUC: Pending	SWRCB: Pending CPUC: N/A	Pending Required following construction
		Required Prior to T	ransportation of Equipment and Materials for Construction	on Activities		
Caltrans Transportation Permit	Movement of oversized or excessive load vehicles on the state transportation network California Vehicle Code	MMCRP	SCE shall acquire the permit and provide a copy to CPUC prior to transportation of oversized equipment on the state transportation network.	Caltrans: Pending CPUC: Pending	Caltrans: Pending CPUC: N/A	Pending
City of Riverside Encroachment Permit	Construction activities within City of Riverside roadways not covered by existing franchise agreements City of Riverside Code of Ordinances Chapter 13.08-Permits	MM TRANS-06	SCE shall acquire the permit and provide a copy to CPUC prior to work within City roadways .	City: Pending CPUC: Pending	City: Pending CPUC: N/A	Pending
City of Jurupa Valley Encroachment Permit	Construction activities within City of Jurupa Valley roadways not covered by existing franchise agreements Jurupa Valley Municipal Code Chapter 13.10 Excavations and Encroachments on City Highways	MM TRANS-06	SCE shall acquire the permit and provide a copy to CPUC prior to work within City roadways.	City: Pending CPUC: Pending	City: Pending CPUC:	Pending

Permit/Authorization	Purpose and Authority	Requirement	Timing and Submittal Requirements	Review/Co	ordination ^a	Status/Notes
		Sources		Submitted	Approved	
		Req	uired Following Specific Discoveries/Determinations			
*United States (U.S.) Army Corps of Engineers (USACE) Section 404 Nationwide Permit	Work in waters of the U.S., including wetlands Section 404 of the Clean Water Act	EPE HYDRO-01	*SCE shall acquire a permit and provide a copy to CPUC prior to impacting waters of the U.S., including wetlands.	*USACE: TBD *CPUC: TBD	*USACE: TBD *CPUC: N/A	TBD Impacts to jurisdictional water features will be avoided and permitting requirements are not anticipated. SCE would be required to obtain the necessary permits if any impact to a jurisdictional water feature becomes anticipated.
*RWQCB Section 401 Water Quality Certification	Consistency with state water quality standards, prior to issuance of a USACE Section 404 Permit. Section 401 of the Clean Water Act	EPE HYDRO-01	*SCE shall obtain a 401 Permit prior to obtaining a Section 404 Permit from USACE, and provide a copy of the permits to CPUC prior to impacting waters of the U.S .	*RWQCB: TBD *CPUC: TBD	*RWQCB: TBD *CPUC: N/A	TBD Impacts to jurisdictional water features will be avoided and permitting requirements are not anticipated. SCE would be required to obtain the necessary permits if any impact to a jurisdictional water feature becomes anticipated.
*California Department of Fish and Wildlife (CDFW) Lake and Streambed Alteration Agreement	Regulates activities that affect waters of the state, including the bed or bank of such features Fish and Game Code Section 1602	EPE HYDRO-01	*SCE shall acquire any permit and provide a copy to CPUC prior to impacting waters of the state .	*CDFW: TBD *CPUC: TBD	*CDFW: TBD *CPUC: N/A	TBD Impacts to jurisdictional water features will be avoided and permitting requirements are not anticipated. SCE would be required to obtain the necessary permits if any impact to a jurisdictional water feature becomes anticipated.
*Riverside County Flood Control and Water Conservation District	Regulates floodplain and drainage development of the Santa Ana River	EPE HYDRO-01	SCE shall acquire any permit and provide a copy to CPUC prior to impacting the Santa Ana River floodplain.	*RCFCWCD: TBD *CPUC: TBD	*RCFCWCD: TBD *CPUC: N/A	TBD-Pending
*U.S. Fish and Wildlife Service (USFWS) Section 10 Incidental Take Permit under the MSHCP	Regulates impacts on federally-listed, threatened, or endangered plants and animals, and the habitats upon which they depend. Section 10 of the Endangered Species Act	MM BIO-01 and MM BIO-01A	*SCE shall acquire permits and provide copies to CPUC prior to any incidental take of federally-listed species or federally-protected habitat.	*USACE: TBD *CPUC: TBD	*USFWS: TBD *CPUC: N/A	TBD SCE would be required to obtain the necessary permits if special- status species are discovered during pre-construction surveys or during construction clearances.
*CDFW Section 2081(b) Incidental Take Permits or Consistency Determination under the MSHCP	Impacts on state-listed, threatened, or endangered species, and the habitats upon which they depend Fish and Game Code Section 2081(b)	MM BIO-01 and MM BIO-01A	*SCE shall acquire any permits and provide copies to CPUC prior to any incidental take of state-listed species or state-protected habitat.	*CDFW: TBD *CPUC: TBD	*CDFW: TBD *CPUC: N/A	TBD SCE would be required to obtain the necessary permits if special-status species are discovered during pre-construction surveys or during construction clearances.

Notes:

^a All project permits, and authorizations provided by other agencies, must be submitted to CPUC. CPUC reserves the right to review and comment on the accuracy and adequacy of project permits and authorizations, if necessary.

^{*} Requirements marked with an asterisk are only applicable under specified conditions described in the Status/Notes column.

Table C-2 Plans Tracking

Plan	Requirement Sources	Timing and Submittal Requirements	Review/	Coordination ^{ab}	Status
			Submitted	Approved	
		Required Prior to All Construction Activities			
Worker Environmental Awareness Program (WEAP) Training Materials	MM BIO-05 MM CUL-02C	SCE shall submit all WEAP materials to CPUC for review and approval prior to the start of construction.	CPUC: 10/13/2021	CPUC: Pending	Pending
Fugitive Dust Control Plan	MM AQ-01	A draft Fugitive Dust Control Plan shall be submitted to the CPUC for review and approval at least 30 days prior to the initiation of construction .	CPUC: 10/13/2021	CPUC : 1/13/2022	Approved
Norker Carpool Program	MM AQ-02	SCE or its contractor shall develop a program and require construction workers to carpool to construction sites.	CPUC: Pending	CPUC: N/A	Pending
Weed Control Plan	MM BIO-09A	The Weed Control Plan shall be submitted to the CPUC for review and approval at least 30 days prior to construction . Qualification requirements associated with the Weed Control Plan are summarized in Table C-5 below.	CPUC: Pending	CPUC : Pending	Pending
Cultural Resources Monitoring and Treatment Plan (CRMTP)	MM CUL-02B	A CRMTP shall be combined with the Construction Monitoring and Unanticipated Cultural Resources Discovery Plan and shall be submitted at least 30 days prior to construction to consulting tribe(s) for review, and the CPUC for review and approval.	CPUC: Pending	CPUC: Pending	Pending
Final Construction Plans	MM CUL-02E	SCE shall submit final construction plans to the CPUC and consulting tribes at least 60 days prior to construction for evaluation of potential cultural resource conflicts are evaluated per MM CUL-02B. Revised construction plans submitted to CPUC for confirmation of incorporate changes at least 14 days prior to construction.	CPUC: Pending Tribes: Pending	CPUC : Pending Tribes : Pending	Pending
Traffic Control Plans	MM TRANS-06	SCE shall prepare and submit Motorized and Non-Motorized Traffic Control Plans (TCPs) to the CPUC for review and approval at least 60 days prior to commencing construction activities.	CPUC: Pending	CPUC: Pending	Pending
Fire Prevention and Management Plan	nent Plan MM HAZ-03 A fire prevention and management plan shall be developed and applicable fire laws and regulations would be observed during the construction period.		CPUC: Pending	CPUC: Pending	Pending
Stormwater Pollution Prevention Plan SWPPP)	MMCRP EPE HAZ-03	A Qualified SWPPP Developer (QSD) shall prepare a SWPPP for the project in accordance with the SWRCB General Permit (refer to Table C-1). The SWPPP shall be implemented prior to the start of construction .	CPUC: Pending	CPUC: N/A	Pending
Spill Prevention, Countermeasure and Control (SPCC) Plan EPA's Oil Pollution Prevention regulation (40 CFR part 112) EPE HAZ-03 Facilities with a total above-ground oil storal prevent oil spills from reaching Waters of the shall be prepared prior to the start of construction.		Facilities with a total above-ground oil storage capacity of greater than 1,320 gallons prepare SPCC to prevent oil spills from reaching Waters of the U.S. In accordance with Title 40 of the CRF, Part 112, a SPCC shall be prepared prior to the start of construction and include engineered and operational methods for preventing, containing, and controlling potential releases, and provisions for safe cleanup and reporting.	CPUC: Pending	CPUC: N/A	Pending
Hazardous Materials Business Plans (HMBPs)	EPE HAZ-03	Prior to the start of construction , a HMBP shall be prepared or updated and submitted, in accordance with Chapter 6.95 of the CHSD, and Title 22 CCR.	CPUC: Pending	CPUC: N/A	Pending
Construction Safety Lighting Plan	EPE AES-08	Prepare a Construction Safety Lighting Plan prior to construction.	CPUC: Pending	CPUC: Pending	Pending
Health and Safety Plan	EPE HAZ-01	A health and safety plan to address site-specific health and safety issues would be prepared and implemented.	CPUC: Pending	CPUC : Pending	Pending
Hazardous Materials Management and Hazardous Waste Management Program	EPE HAZ-01	A project-specific Hazardous Materials Management and Hazardous Waste Management Program would be developed prior to initiation of the project.	CPUC: Pending	CPUC : Pending	Pending

Requirement Sources	Timing and Submittal Requirements Review/Coordination ab		Timing and Submittal Requirements Review/Coordination		Status
		Submitted	Approved		
EPE HAZ-01	An Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to construction activities.	CPUC: Pending	CPUC: Pending	Pending	
EPE HAZ-02	The Soil Management Plan would provide guidance for the proper handling, on site management, and disposal of impacted soil that might be encountered during construction activities.	CPUC: Pending	CPUC: Pending	Pending	
	Required Following Specific Discoveries/Determinations				
MM BIO-15	SCE shall submit the determination to the CPUC for review and approval at least 90 days before construction in riparian areas.	CPUC: TBD	CPUC: TBD	TBD	
MM CUL-04A	A qualified paleontologist shall prepare a PMTP with specifications for excavations within the project area and part-time monitoring of ground-disturbing activities that occur in areas with indeterminate, low, or marginal paleontological sensitivity.	CPUC: TBD	CPUC: TBD	TBD	
	EPE HAZ-01 EPE HAZ-02 MM BIO-15	EPE HAZ-01 An Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to construction activities. EPE HAZ-02 The Soil Management Plan would provide guidance for the proper handling, on site management, and disposal of impacted soil that might be encountered during construction activities. Required Following Specific Discoveries/Determinations MM BIO-15 SCE shall submit the determination to the CPUC for review and approval at least 90 days before construction in riparian areas. MM CUL-04A A qualified paleontologist shall prepare a PMTP with specifications for excavations within the project area and part-time monitoring of ground-disturbing activities that occur in areas with indeterminate, low, or	EPE HAZ-01 An Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to construction activities. EPE HAZ-02 The Soil Management Plan would provide guidance for the proper handling, on site management, and disposal of impacted soil that might be encountered during construction activities. Required Following Specific Discoveries/Determinations MM BIO-15 SCE shall submit the determination to the CPUC for review and approval at least 90 days before construction in riparian areas. CPUC: TBD MM CUL-04A A qualified paleontologist shall prepare a PMTP with specifications for excavations within the project area and part-time monitoring of ground-disturbing activities that occur in areas with indeterminate, low, or	EPE HAZ-01 An Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to construction activities. EPE HAZ-02 The Soil Management Plan would provide guidance for the proper handling, on site management, and disposal of impacted soil that might be encountered during construction activities. Required Following Specific Discoveries/Determinations MM BIO-15 SCE shall submit the determination to the CPUC for review and approval at least 90 days before construction in riparian areas. MM CUL-04A A qualified paleontologist shall prepare a PMTP with specifications for excavations within the project area and part-time monitoring of ground-disturbing activities that occur in areas with indeterminate, low, or	

Notes:

^a All project Plans required by other agencies must be submitted to CPUC.

b CPUC reserves the right to review and comment on the accuracy and adequacy of all project Plans.

^{*} Requirements marked with an asterisk are only applicable under specified conditions described in the requirement source.

Table C-3 Notifications Tracking

Notification	Entities to Notify	Requirement Sources	Timing and Submittal Requirements	Review/C	oordination ^a	Statu	
				Submitted	Approved		
			Required Prior to All Construction Activities				
Rule 403 Large Operation Notification	SCAQMD	MM AQ-01	Submit a Rule 403 Large Operation Notification to SCAQMD with a copy provided to CPUC for verification.	CPUC: Pending	CPUC: N/A	Pending	
Fugitive dust signage	The general public	MM AQ-01	A sign shall be posted near the entrance of the facility with a responsible individual's name and phone number in case there are any fugitive dust control issues at the site.	CPUC: Pending	CPUC: N/A	Pending	
General construction noise disturbance	All noise-sensitive receptors within 500 feet all construction	MM NOI-04	SCE shall provide notice by mail at least 1 week prior to construction activities to all sensitive receptors and residences within 500 feet of all construction.	CPUC: Pending	CPUC: N/A	Pending	
			Required Prior to Specific Construction Activities				
Utility distribution service interruption	Members of the public affected by the planned outage	MM UTIL-02	Prior to construction in which a utility distribution service interruption is known to be unavoidable, SCE shall notify members of the public affected by the planned outage at least 10 calendar days prior to the impending interruption for residential and commercial outages.	CPUC: Pending	CPUC: N/A	Pending	
Lane or road closures	Fire departments, police departments, ambulance, and paramedic services, residents within 300 feet, and schools providing school bus service in the area (i.e., Troth Elementary and Louis Vandermolen Fundamental Elementary)	MM TRANS-06	SCE shall notify local emergency personnel, residents within 300 feet, and schools providing school bus service in the area at least 7 days prior to lane or road closures .	CPUC : Pending	CPUC: N/A	Pending	
Bus stop closure/detour	Members of the public	MM TRANS-08	SCE shall post signs at the affected bus stops on Pats Ranch Road and Limonite Avenue. The signs shall be posted at least 2 weeks in advance of road or lane closures and shall indicate when the bus stops along Pats Ranch Road or Limonite Avenue would be unavailable and where the nearest bus stop for RTA bus lines 29 or 3 is located.	CPUC: Pending	CPUC: N/A	Pending	
Pedestrian or equestrian closure/detour	Members of the public	MM TRANS-08	SCE shall post signs at pedestrian/equestrian intersections at least 2 weeks in advance of construction that are anticipated to be affected by closures and/or detours. These signs shall state the date range of construction and shall indicate the route of pedestrian/equestrian detours during construction.	CPUC: Pending	CPUC: N/A	Pending	
Construction activities within recreational areas	Closures would be coordinated with recreational facility owners	MM REC-01	Post notices prior to the closure.	CPUC: Pending	CPUC: N/A	Pending	
			Required Following Specific Discoveries/Determinations				
*Bats	CPUC, RCA, CDFW	MM BIO-03	* If active bat roost is unavoidable, RPU and SCE would consult with RCA and CDFW and implement their recommendations.	*CPUC: TBD *RCA: TBD *CDFW: TBD	*CPUC: N/A *RCA: TBD *CDFW: TBD	TBD	
*Raptors	CPUC, USFWS, CDFW	MM BIO-08	*If active raptor nests are unavoidable, RPU and SCE would consult with the appropriate agencies (USFWS and CDFW) and implement their recommendations.	*CPUC: TBD *USFWS: TBD *CDFW: TBD	*CPUC: N/A *USFWS: TBD *CDFW: TBD	TBD	

Notification	ion Entities to Notify Requirement Sources Timing and Submittal Requirements				Review/Coordination ^a		
				Submitted	Approved		
*Previously undiscovered cultural resources	CPUC; consulting tribe(s)	MM CUL-02B	*If unanticipated cultural resources are discovered during construction, the Qualified Archaeologist, consulting tribe(s), and the CPUC shall be notified.	*CPUC: TBD *Tribes: TBD	*CPUC: N/A *Tribes: TBD	TBD	
*Previously undiscovered human remains	CPUC; Medical Examiner; NAHC	MM CUL-02D	* In the event that human remains or suspected human remains are identified, the Qualified Archaeologist and SCE shall be immediately notified , and the Qualified Archaeologist shall examine the find. If the Qualified Archaeologist determines that there may be human remains, SCE shall immediately contact the Medical Examiner at the Riverside County Coroner's office. If the Medical Examiner believes the remains are Native American, he/she shall notify the NAHC within 24 hours . If the remains are not believed to be Native American, the appropriate local law enforcement agency shall be notified. The NAHC shall immediately notify the person it believes to be the most likely descendant (MLD) of the remains.	*CPUC: TBD *Tribes: TBD	*CPUC: N/A *Tribes: TBD	TBD	
*Previously undiscovered tribal cultural resources	CPUC; affected tribe(s)	MM CUL-02E	* In the event of an inadvertent discovery, no activities shall be conducted within the boundaries of a known tribal cultural resource until SCE has obtained concurrence on avoidance and minimization methods from affected consulting tribes. The CPUC shall make a final determination if SCE cannot obtain concurrence from the tribes within 60 days of initial identification of the potential cultural resource conflict.	*CPUC: TBD	*CPUC: N/A	TBD	

Notes:

- a Notifications and documentation required by other agencies must also be submitted to CPUC. CPUC reserves the right to review and comment on the accuracy and adequacy of notification materials, if necessary.
- * Requirements marked with an asterisk are only applicable under specified conditions described in the requirement source.

Table C-4 Surveys Tracking

Resource/Topic	Requirement Sources	Freq. Before Construction ^a	Freq. During Construction	Freq. After Construction	Status
Western burrowing owl+*	MM BIO-03	Once			Pending
Migratory birds*+	MM BIO-08	Once	No more than two to three days prior to vegetation clearing or ground disturbance during nesting season ^b		Pending
Western mastiff bat*	MM BIO-03	Once			Pending
Western yellow bat*	MM BIO-03	Once			Pending
Delhi sands flower- loving fly+	MM BIO-14	Once			Pending
Narrow endemic plants*+	MM BIO-03	Once			Pending
Invasive Weeds*+	MM BIO-09A	Once	Annually from the time construction begins	Annually from the time construction begins until 2 years after construction is complete	Pending
Jurisdictional wetlands*+	MM BIO-10	Once			Pending
Cultural resources*+	MM CUL-01	Once			Pending
Geotechnical investigation*+	EPE GEO-01	Once			Pending
Roads and sidewalks*+	MM TRANS-07	Once		Once	Pending

Notes:

a If construction is delayed for more than 30 days or otherwise specified, pre-construction surveys may need to be repeated, as determined through coordination with CPUC, and potentially USFWS and CDFW.

^b Surveys shall be conducted from February 15 through August 15.

^{*} From 2013 RTRP EIR

⁺ From SFEIR

Table C-5 Specific Personnel Qualification Requirements Tracking

Role	Requirement Source	Qualifications and Submittal Timing
Qualified Biologist	MM BIO-03	Refer to the requirement source(s).
	MM BIO-08	
Weed Control Treatment Developer	MM BIO-09A	Refer to the requirement source(s).
Licensed Qualified Herbicide Applicator	MM BIO-09A	Refer to the requirement source(s).
Qualified Archaeologist	MM CUL-02	Refer to the requirement source(s).
	MM CUL-02A	
	MM CUL-02B	
	MM CUL-02D	
Qualified Archaeological Monitor	MM CUL-02B	Refer to the requirement source(s).
Tribal Cultural Monitor	MM CUL-02B	Refer to the requirement source(s).
Qualified Paleontologist	MM CUL-03	Refer to the requirement source(s).
	MM CUL-04	
	MM CUL-04A	
	MM CUL-05	
	MM CUL-08	
Qualified Paleontological Monitor	MM CUL-03	Refer to the requirement source(s).
	MM CUL-04	
	MM CUL-04A	
	MM CUL-05	
Qualified HAZWOPER Worker	MM HAZ-01	Refer to the requirement source(s).

Table C-6 Specific SCE Reporting Requirements Tracking

Report	Preparation/Submittal Frequency ^a	Requirement Sources	Contents	Status
		Before Co	nstruction	
Pre-Activity Study Report vegetation impacts)	Pre-Activity Study Report is provided to CPUC at least 30 days prior to construction .	MM AES-01	Report shall include: description of work location, size, equipment, and methods required for project activities that may disturb vegetation; map of work area location; documentation of surrounding land uses; photographs of the area to be disturbed; documentation of vegetation types, species, and quantity to be removed; proposed landscape revegetation plans; and records of communication with landowners indicating approval of revegetation plans.	Pending
alculation evidence for off-road quipment, as needed	Submit calculation evidence to the CPUC for review at least 2 weeks prior to use of off-road equipment that does not meet Tier 4 emissions standards.	MM AQ-02	SCE or the contractor may be allowed to operate off-road equipment that does not meet Tier 4 emissions standards if SCE provides calculation evidence that use of the equipment will not cause an exceedance of SCAQMD significance thresholds. SCE must make a due diligence search to find and use equipment with the Tier 4 emissions standards or the highest emissions standards available. Circumstances where this may be applicable are limited to the following situations: (1) the equipment is specialty or unique and cannot be found with a Tier 4 engine (e.g., sag cat with three winches, PM10 street sweepers); (2) the equipment is not in use for more than 5 days total; and/or (3) the equipment is registered under CARB's Statewide Portable Equipment Registration Program.	Pending
etermination of a Biologically quivalent or Superior Preservation deport	Determination of a Biologically Equivalent or Superior Preservation (DBESP) Report is prepared at least 90 days prior to construction within riparian habitat areas. Prior to approval of Biologically Equivalent or Superior Preservation Determinations, Wildlife Agencies and CPUC are notified and provided a 60-day review and response period.	MM BIO-15	Report shall include: quantification of unavoidable impacts to riparian/riverine areas associated with the project, including direct and indirect effects; a written description of project design features and mitigation measures that reduce indirect effects, such as edge treatments, landscaping, elevation difference, minimization and/or compensation through restoration or enhancement; and a finding demonstrating that although the Proposed Project would not avoid impacts, with proposed design and compensation measures, the project would be biologically equivalent or superior to that which would occur under an avoidance alternative without these measures.	Pending
Geotechnical Study Report	Geotechnical Study Report is submitted to CPUC no less than 60 days prior to construction .	EPE GEO-01	Identify site-specific soils and geologic conditions	Pending
re-Construction Road and idewalk Condition Assessment	Pre-Construction Road and Sidewalk Condition Assessment is submitted to CPUC and the City of Jurupa Valley no less than 30 days prior to construction .	MM TRANS-07	Pre-construction road and sidewalk condition assessment along roadways and sidewalks along the underground alignment and construction traffic routes. The pre-construction road and sidewalk condition assessment shall include photographs or a video recording along the construction route public roads within 500 feet in each direction of project access points and roadways where the road surface would be damaged by project-related trenching and digging.	Pending
		During Co	nstruction	
Equipment air quality documentation	Provide air quality documentation for each applicable unit of equipment at the time of mobilization.	MM AQ-02	During Project construction, all off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations (i.e., if Project construction goes beyond the anticipated schedule). A copy of each unit's certified tier specification, BACT documentation, CARB or SCAQMD operating permit, and Truck Regulation Upload, Compliance and Reporting System receipt shall be provided to the CPUC at the time of mobilization for each applicable unit of equipment.	Pending

Report	Preparation/Submittal Frequency ^a	Requirement Sources	Contents	Status
Monthly Environmental Training Program (ETP) Logs	Information collected daily and submitted to CPUC monthly during construction.	EPE AQ-02 MM BIO-05 MM CUL-02C EPE HAZ-01 EPE HAZ-04 MM HAZ-03	Training logs and sign-in sheets for staff who have participated in the ETP, including their training level (refer to Section 2.2.4).	Pending
Nesting Bird Reports b	Information collected daily/as needed and submitted to CPUC monthly during construction occurring within the avian nesting season (generally between February 1 and August 31).	MM BIO-08	Description of nests identified during the monthly reporting period including the location, species, exclusion buffer, construction activities within buffers, and monitoring observations. Report should include a map of the locations and buffers.	Pending
	Annual summary reports are prepared and submitted to CPUC during construction for each nesting season.		Annual summary of all avian-related monitoring results and outcomes.	
*Cultural Resource Evaluation Plan	Evaluate the significance of all cultural resources that cannot be avoided and provide the CPUC with applicable studies prior to conducted any activity that may impact the resource.	EPE CUL-03 MM CUL-02B	Refer to requirement sources.	Pending
*Cultural Resource Data Recovery Plan	Data recovery plans for historical resources that cannot be fully avoided shall be prepared in accordance with CEQA Guidelines Section I 5126.4(b)(3)(C) and PRC Section 21083.2, as applicable.	MM CUL-02B	Refer to requirement source.	Pending
*Cultural Resource Data Recovery Field Memo	Following implementation of the Data Recovery Plan, the Data Recovery Field Memo shall be prepared whenever an unanticipated resource is discovered during construction.	MM CUL-02B	Refer to requirement source.	Pending
*Cultural Resources Data Recovery Report	Within 90 days of submittal of the Data Recovery Field Memo following an unanticipated resource discovery, a Data Recovery Report is prepared and submitted to CPUC and consulting tribes(s), if appropriate. Once approved, the Data Recovery Report is filed with the Eastern Information Center.	MM CUL-02B	Report shall present: 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); conclusions drawn from the work; indicate where artifacts, samples, and documentation resulting from the data recovery program will be curated; and specify that the curation facility meets the requirements of 36 CFR 79.	Pending
SWPPP Visual Inspection and Storm Reports	Prepared for each qualifying rain event (QRE) (0.5 inch or more of precipitation within a 48 hour or greater period between rain events) and quarterly for non-stormwater discharges. Submitted to the Regional Water Board and CPUC upon request until SWPPP coverage is complete °c.	EPE HAZ-03	Visual inspection observations, proposed erosion and sediment control details, any corrective actions, the results of water quality sampling, and analysis of stormwater discharges associated with the project site.	Pending
SWPPP Numeric Action Level (NAL) Exceedance Reports	Prepared when values for parameters for pH and turbidity are exceeded and submitted to the Regional Water Board and CPUC upon request.		Sampling methodology, a description of the best management practices (BMPs) associated with the sample that exceeded the NAL and the proposed corrective actions taken.	Pending
SWPPP Monthly and Annual Reports	Prepared monthly and annually for each year of SWPPP coverage and submitted to CPUC until SWPPP coverage is complete $^{\rm c}$.	-	Stormwater data, evaluations, required forms, a summary of all corrective actions taken during the compliance year, and identification of any compliance activities or corrective actions that were not implemented.	Pending
Weed Inventory and Monitoring Report	Weed Inventory and Monitoring Report is prepared annually during construction and submitted to CPUC.	MM BIO-09A	Annual surveying for new invasive weed populations and the monitoring of identified and treated populations	Pending
		After Cor	nstruction	
Documentation of completed revegetation activities	Documentation of completed revegetation submitted to CPUC for final approval no later than 30 days after project completion.	MM AES-01	Documentation of completed revegetation activities, including planting container stock or seeding.	Pending

Report	Preparation/Submittal Frequency ^a	Requirement Sources	Contents	Status
Determination of a Biologically Equivalent or Superior Preservation Report	Annual monitoring and reporting conducted as required in the approved DBESP.	MM BIO-15	Annual Monitoring Report as required by Determination of a Biologically Equivalent or Superior Preservation	Pending
Post-Construction Road and Sidewalk Condition Assessment	SCE shall restore damaged roadways and sidewalk (e.g., asphalt, curbs, and gutters) within 60 days after the completion of construction. Report is submitted to CPUC upon completion .	MM TRANS-07	Post-construction road and sidewalk condition assessment along 68th Street, Pats Ranch Road, Limonite Avenue, Wineville Avenue, Cantu-Galleano Ranch Road, and Etiwanda Avenue. The post-construction road and sidewalk condition assessment shall include photographs or a video recording along the construction route public roads within 500 feet in each direction of project access points and roadways where the road surface would be damaged by project-related trenching and digging.	Pending
Paleontological Mitigation Report	Paleontological Mitigation Report is prepared after construction is complete and is submitted to CPUC within 60 days of the close of construction for review and approval.	MM CUL-08 MM CUL-08A	The report will include: a description and maps of the Project area; descriptions of paleontologically sensitive or fossiliferous sediments in the Project vicinity; discussions of the methods used during monitoring and during fossil recovery; descriptions and illustrations of the stratigraphic section(s) exposed, fossils collected, including taxonomic data; photographs of the locations of recovered fossils; an assessment of the significance of the recovered fossils; complete contextual data from the fossil locality, including sedimentology and taphonomy; and a record of accession of the fossils to the selected repository, including specimen numbers.	Pending
Weed Inventory and Monitoring Report	Weed Inventory and Monitoring Report is prepared annually for 2 years after construction is complete and is submitted to CPUC.	MM BIO-09A	Annual surveying for new invasive weed populations and the monitoring of identified and treated populations.	Pending

Notes:

- ^a When not specified in the mitigation measure or EPE, reports are to be submitted to CPUC with sufficient time for review.
- Monthly Nesting Bird Reports are not required if work does not occur within the preliminary buffers during the month as specified in MM BIO-08.
- SWPPP coverage and reporting requirements typically begin with the start of construction and extend into the post-construction restoration period. SWPPP coverage ends when the project site is stabilized, disturbed areas reach a minimum of 70 percent vegetation coverage, and Notice of Terminations have been filed ending SWPPP coverage. SWPPP reports and other documents are submitted to the SWRCB via the SMARTS website, and can be downloaded by entering the project Wastewater Discharger Identification (WDID) Number located in the SWPPP.
- * Requirements marked with an asterisk are only applicable under specified conditions.

Appendix D Project Personnel and Contact List (Confidential)

APPENDIX D (CONFIDENTIAL)

Table D-1 SCE Compliance Team and Contact Information

MMCRP Role	Name, Organization, Title	Name, Organization, Title Contact Information	Review/	Review/Coordination	
			Submitted	Approved	
	Environ	mental Leads			
SCE Project Manager	En	nail:	N/A	N/A	
	Ph	one:			
SCE Environmental Coordinator		nail:	N/A	N/A	
	Ph	one:			
SCE Compliance Manager		nail:	N/A	N/A	
	Ph	one:			
SCE Lead Environmental Monitor		nail:	N/A	N/A	
	Ph	one:			
SCE Environmental Monitor		nail:	N/A	N/A	
	Ph	one:			
SCE Environmental Monitor		nail:	N/A	N/A	
	Ph	one:			
	Specialty Monito	rs (Refer to Table 2.2-3)			
Qualified Biologist	En	nail:	CPUC:	CPUC:	
	Ph	one:			
Qualified Avian/Burrowing Owl	En	nail:	CPUC:	CPUC:	
Biologist	Ph	one:			
Qualified Bat Biologist	En	nail:	CPUC:	CPUC:	
	Ph	one:			
Qualified Herpetologist	En	nail:	CPUC:	CPUC:	
	Ph	one:			

APPENDIX D (CONFIDENTIAL)

MMCRP Role	Name, Organization, Title	Contact Information	Review/	Review/Coordination	
			Submitted	Approved	
Avian Monitor		Email:	CPUC:	CPUC:	
		Phone:			
Qualified Botanist		Email:	CPUC:	CPUC:	
		Phone:			
Qualified Archaeologist		Email:	CPUC:	CPUC:	
		Phone:			
Qualified Archaeological Monitor		Email:	CPUC:	CPUC:	
		Phone:			
Tribal Cultural Monitor		Email:	CPUC:	CPUC:	
		Phone:			
Qualified Paleontologist		Email:	CPUC:	CPUC:	
		Phone:			
Paleontological Monitor		Email:	CPUC:	CPUC:	
		Phone:			
Qualified SWPPP Developer		Email:	CPUC:	CPUC:	
		Phone:			
Qualified SWPPP Practitioner		Email:	CPUC:	CPUC:	
		Phone:			
	Constru	uction Workforce			
Construction Supervisor		Email:	N/A	N/A	
		Phone:			
Construction Contractor		Email:	N/A	N/A	
		Phone:			

APPENDIX D (CONFIDENTIAL)

MMCRP Role	Name, Organization, Title	Contact Information	Review/Coordination	
			Submitted	Approved

Notes:

Table D-2 CPUC Monitoring Team and Contact Information

MMCRP Role	Name, Organization, Title	Contact Information
CPUC Project Manager	Andrew Barnsdale, CPUC Energy Division	Email: andrew.barnsdale@cpuc.ca.gov
	Project Manager	Phone : (415) 703-2200
CPUC Monitoring Manager	Rita Wilke, Panorama	Email: rita.wilke@panoramaenv.com
	Project Manager	Phone: (650) 290-7214
CPUC Monitoring Supervisor	Sean Pagnon, Panorama	Email: sean.pagnon@panoramaenv.com
	Environmental Planner	Phone: (650) 290-7217
CPUC Environmental Inspector		Email:
		Phone:
CPUC Environmental Inspector		Email:
		Phone:

^{*} Requirements marked with an asterisk are only applicable under specified conditions, as noted in the requirement source.

Appendix E Forms



INCIDENT REPORT

Project Name:	Contractor:
Date:	Parcel Number:
Landowner:	
General Location(s)(e.g.,Landon Drive):	_
Specific Location(s)(e.g., Pole #, PS,Yard, Access	s Rd):
Identified By:	
Verbal Notification? yes ☐ no ☐ Notification D	Date:Individual Notified:
Compliance Level?	
mitigation measure plan/procedure drawing permit condition	specification regulatory requirement other
Specify Source (e.g., Mitigation Measure BIO-8): _	
Did the noncompliance result in resource damage	? yes no
DESCRIPTION: (Include a detailed description, include sheets if necessary.)	ding information on any resources damaged. Attach additional
CORRECTIVE ACTION REQUIRED: yes no (Attach additional sheets if necessary.)	DEADLINE FOR CORRECTIVE ACTION:
SIGNATURE:	
Name:	Title:
Signature:	Date:

MINOR PROJECT REFINEMENT REQUEST FORM



Part A: Request Description

MPR Request			
Request Number:	[Number]		
Date Requested:	[Date submitted to CPUC]		
Proposed Duration/	[Start date] to [End date]		
Timing of Use:	[Days of the week]; [Times of the day]		
Location:	[Description]		
	[Approximate dimensions and acreage]		
Attached Map?	□ Yes □ No		
Proposed Action(s)			
[List and describe each pro	oposed action]		
Purpose(s)			
[Explain why the proposed	action(s) are necessary]		
Part B: Existing Condition	ons		
Existing Land Uses:	[Description]		
	[Any mitigation considerations]		
Surrounding Land Uses:	[Description]		
	[Any mitigation considerations]		
Sensitive Receptors within 500 feet:	[Description]		
	[Any mitigation considerations]		
Environmental Recourses within 500 feet:	[Description]		
	[Any mitigation considerations]		
Has landowner approval	□ Yes □ No □ N/A		
been granted?	[Description]		

Surveys

Landowner:

List any new survey reports under Part D and attach a copy.

[Name and address]

Biological Resources. Were all sites associated with the proposed action(s) surveyed for biological resources with the potential to occur in the area? If so, were survey results positive or negative? Were surveys completed during the appropriate timing and season to detect resources?

[Description]

Cultural Resources. Were all sites associated with the proposed action(s) surveyed for cultural resources (records search and pedestrian survey)? If so, were survey results positive or negative?

[Description]

Jurisdictional Waters. Were all sites associated with the proposed action(s) surveyed for hydrologic resources? If so, were survey results positive or negative?

[Description]

MINOR PROJECT REFINEMENT REQUEST FORM

Part C: Permits, Agency Approvals, and Environmental Protection Measures

List any new permits or agency approvals under Part D and attach a copy.

Have all required permits, permit amendments/authorizations, or agency approvals been issued by resource agencies with applicable jurisdiction? Describe if necessary.

[Description]

Would the proposed action(s) conflict with permit conditions or agency approvals? Describe if necessary.

[Description]

Would the proposed action(s) conflict with environmental protection elements (EPEs) or mitigation measures (MMs) listed in the Subsequent Environmental Impact Report (SEIR)? Describe if necessary.

[Description]

Part D: Attached Materials

List any attached materials (e.g. surveys, maps, photos, memos, agency authorizations, etc.) below. Materials should be attached to the end of this form.

[List attached materials]

NOTICE TO PROCEED REQUEST FORM



To: [CPUC Point of Contact]

California Public Utilities Commission

505 Van Ness Avenue San Francisco, CA 94102

From: [Applicant Contact Information]

Request Summary

Project: SCE Riverside Transmission Reliability Project

CPUC Decision Number: 20-03-001

NTP Number: [Number]

Date Requested: [Date submitted to CPUC]

Requested Approval

Date:

[Date of requested approval by CPUC]

Anticipated Start and End Date for the

End Date for the Proposed Actions: [Start date] to [End date]

Request Details

Description of the proposed actions requested in the NTP:

[Description]

Summary of project activities that have been previously authorized under prior NTP Authorization Letters (if applicable):

[Description]

Summary of project activities that have not yet been authorized and that must be included with future NTP requests:

[Description]

Summary of any outstanding requirements and documentation that apply to this NTP and that are not included with the NTP package, and the anticipated dates they will be provided (if applicable). Submittal of documentation of the completion of these requirements prior to the start of the corresponding activities would likely be included as a condition of approval of this NTP:

[Description]

Minor Project Refinements or Temporary Extra Workspace

Minor Project Refinements or Temporary Extra Workspace related to the proposed actions:

[Summarize any Minor Project Refinement or Temporary Extra Workspace request(s) associated with the NTP]

Attached Materials

List any attached materials below. Materials should be attached to the end of this form. At a minimum, please include updated versions of the six requirement tracking tables (Tables C-1, C-2, C-3, C-4, C-5, and C-6 from the MMCRP).

[List attached materials]

NOTICE TO PROCEED REQUEST FORM

TEMPORARY EXTRA WORKSPACE REQUEST FORM



Request Description			
Request Number:	[Number]		
Date Requested:	[Date submitted to CPUC]		
Proposed Duration/	[Start date] to [End date]		
Timing of Use:	[Days of the week]; [Times of the day]		
Location:	[Description]		
	[Approximate dimensions and acreage]		
Attached Map?	☐ Yes ☐ No		
Proposed Uses			
[Description]			
Existing Conditions			
Existing Land Uses:	[Description]		
	[Any mitigation considerations]		
Surrounding Land Uses:	[Description]		
•	[Any mitigation considerations]		
Sensitive Receptors	[Description]		
within 500 feet:	[Any mitigation considerations]		
Environmental Recourses	[Description]		
within 500 feet:	[Any mitigation considerations]		
Has landowner approval	☐ Yes ☐ No ☐ N/A		
been granted?	[Description]		
Landowner:	[Name and address]		
Condition after Use			
[Description]			
[Any mitigation considerat	ions]		
Checklist			
1. Have applicable landov	vners approved the location, proposed use, and duration?	□ Yes	□ No
2. Is the TEWS located in a	previously disturbed area?	☐ Yes	□ No
3. Are there sensitive resou	rces or land uses within or in proximity to the TEWS?	□ Yes	□ No
4. Would use of the TEWS re	esult in any significant environmental impacts?	□ Yes	□ No
Note: Answering "No" to q	uestions 1 or 2, or "Yes" to questions 3 or 4 may be cause fo	r denial.	

TEMPORARY EXTRA WORKSPACE REQUEST FORM

Review and Approval

Standard Conditions of Approval

- The CPUC shall review and approve or deny TEWS requests within four business days of receiving a completed form.
- CPUC approval is valid once a signature is provided on a hardcopy or a confirmation email has been provided with the attached TEWS.
- Use of an approved TEWS is limited to 60 days or less.
- *No hazardous materials may be stored at the site.*
- Use of an approved TEWS must comply with all mitigation measures, plan procedures, and local ordinances that are applicable to the project and TEWS activities.
- Use of an approved TEWS shall not exceed the limitations described in the TEWS request form. Amended requests must be submitted to CPUC for review and approval.
- The CPUC shall be informed of any complaints regarding an approved TEWS within 24
- An approved TEWS may be revoked at any time of the conditions of approval are not followed.

Site-specific Conditions o	f Approval	
[Description]		
Names and Dates of Appr	oval	
SCE Compliance Team		
MMCRP Role	Name	Date of Approval
[Enter construction lead]	[Enter]	[Enter]
[Enter compliance lead]	[Enter]	[Enter]
CPUC Monitoring Team		
MMCRP Role	Name	Date of Approval
[Enter monitoring lead]	[Enter]	
Signature or Date of Confirmation Email:	[Enter]	[Enter]

Appendix F Mitigation Monitoring Program

Mitigation Monitoring and Reporting Program

Introduction

The City of Calistoga (City) is the lead agency implementing the California Environmental Quality Act (CEQA) environmental document for the Water Reliability Transmission and Distribution Improvement - Conn Creek Water Line Project (project). The City prepared an Initial Study/Mitigation Negative Declaration (IS/MND) to identify and evaluate potential environmental impacts associated with the project. Mitigation measures are defined in the IS/MND to reduce potentially significant impacts of project construction and operation. All measures designated as mitigation measures reduce potential impacts to the associated resource to less than significant levels.

Approval of the project will require implementation and monitoring of all the mitigation measures identified in the IS/MND. CEQA Section 15097(a) requires that:

"... In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program."

CEQA Section 15097(c) defines monitoring and reporting responsibilities of the lead agency.

- "(c) The public agency may choose whether its program will monitor mitigation, report on mitigation, or both. "Reporting" generally consists of a written compliance review that is presented to the decision making body or authorized staff person. A report may be required at various stages during project implementation or upon completion of the mitigation measure. "Monitoring" is generally an ongoing or periodic process of project oversight. There is often no clear distinction between monitoring and reporting and the program best suited to ensuring compliance in any given instance will usually involve elements of both. The choice of program may be guided by the following:
 - (1) Reporting is suited to projects which have readily measurable or quantitative mitigation measures or which already involve regular review. For example, a report may be required upon issuance of final occupancy to a project whose mitigation measures were confirmed by building inspection.

- (2) Monitoring is suited to projects with complex mitigation measures, such as wetlands restoration or archeological protection, which may exceed the expertise of the local agency to oversee, are expected to be implemented over a period of time, or require careful implementation to assure compliance.
- (3) Reporting and monitoring are suited to all but the most simple projects. Monitoring ensures that project compliance is checked on a regular basis during and, if necessary after, implementation. Reporting ensures that the approving agency is informed of compliance with mitigation requirements."

This MMRP is meant to facilitate implementation and monitoring of the mitigation measures to ensure that measures are executed. This process protects against the risk of non-compliance.

The purpose of the MMRP is to:

- Summarize the mitigation required for the project
- Comply with requirements of CEQA and the CEQA Guidelines
- Clearly define parties responsible for implementing and monitoring the mitigation measures
- Provide a plan for how to organize the measures into a format that can be readily implemented by the City and monitored

MMRP Components

The MMRP provides a summary of all mitigation measures that will be implemented for the project. The mitigation measures are organized into three tables based on the timeframe for implementation:

- Table F-1: Mitigation Measures Prior to Construction
- Table F-2: Mitigation Measures During Construction
- Table F-3: Mitigation Measures After Construction

Mitigation measures could be applicable during one or more implementation phase. Each mitigation measure is accompanied with identification of:

- Application Locations locations where the mitigation measures will be implemented.
- Monitoring/Reporting Action the monitoring and/or reporting actions to be undertaken to ensure the measure is implemented.
- Responsible and Involved Parties the party or parties that will undertake the measure and will monitor the measure to ensure it is implemented in accordance with this MMRP

The responsible and involved parties will utilize the MMRP to identify actions that must take place to implement each mitigation measures, the time of those actions and the parties responsible for implementing and monitoring the actions.

 Table F-1
 Mitigation Measures – Prior to Construction

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
Biological	Resources		
Within one year prior to construction, a qualified botanist shall survey all potentially impacted project areas for special-status plants during the blooming season (roughly June through October), with particular emphasis on oak woodlands where Napa false indigo and Napa bluecurls may occur. Surveys shall be conducted in accordance with CDFW's Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities (California Natural Resource Agency Department of Fish and Wildlife, 2018). All special-status plants observed within project impact areas shall be flagged in the field, photographed, and the Global Positioning System coordinates shall be recorded. Special-status plants shall be avoided during construction. In the event that special-status plants species are discovered during surveys and cannot be avoided during project construction, a qualified biologist shall prepare a mitigation and monitoring plan for CDFW review and approval prior to starting project construction. The plan shall consider the potential for impacts to all special status plant species including Napa false indigo and Napa bluecurls.	All work areas	 Within one year prior to construction, a qualified botanist shall survey all work areas for special-status plants during the blooming season. Flag all observed special-status plants Photograph and record the coordinates of all observed special-status plants If special-status species plants are identified and cannot be avoided, prepare Mitigation and Monitoring Plan and obtain CDFW approval. Prepare and implement 	 The City Qualified botanist CDFW botanical state
 Mitigation and Monitoring Plan The mitigation and monitoring plan shall include but not be limited to: An onsite habitat enhancement and planting plan, and off-site planting if there is not suitable habitat within the Project area to support a 3:1 individual plants planted to individual plants removed ratio; Success criteria, A minimum of 5 years of monitoring, and Control of invasive species and any other practice to ensure plantings achieve success criteria. 		Long-term Management Plan funding security, and/or preserve habitat as required in consultation with CDFW.	

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
A long-term management plan shall be prepared and implemented, funding shall be provided for management of the protected lands in perpetuity pursuant to the long-term management plan, and a land manager shall be designated prior to Project construction. Alternatively, the City of Calistoga could provide a financial security, such as a letter of credit, to an accredited Land Trust such for implementing the habitat protection described above. If a security is provided, the conservation easement shall be recorded within 18 months of the initiation of Project construction. The Land Trust will hold the security until the City satisfies all obligations of the Mitigation and Monitoring Plan, including achieving success criteria. Alternatively, the Mitigation and Monitoring Plan can include preservation of habitat of equal or greater habitat value than the Project area for the rare plant species impacted by the Project, as determined by a qualified botanist. The preservation area must be protected under a conservation easement prior to construction with the same requirements for long-term management as outlined above.			
MM BIO-2: Worker Environmental Awareness Training Prior to construction, all contractor construction personnel shall attend an environmental training program provided by the City of Calistoga's biological contractor/qualified biologist. For site supervisors, foremen, and project managers, training shall require up to 1 day to complete. Non-supervisory contractor personnel are required to attend training for up to 30 minutes. The training shall discuss all sensitive habitats and sensitive species that may occur within the project work limits, including all the species listed above in Table 4.4 2. The training shall include the responsibilities of contractor's construction personnel, applicable mitigation measures, and notification requirements. The training shall also address other measures that protect biological resources, such as limiting all vehicle speeds to fifteen (15) miles per hour or less at the construction site and any adjacent unpaved roads during construction and post construction. The following information shall also be provided during the training:	All work areas	All construction personnel shall attend an environmental training program prior to construction.	The City All contractor personnel
 Specific information regarding the special-status species potentially present and their habitat needs 			

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
 Information regarding special-status species occurrences in the project area An explanation of the status of each listed species and their protection under state and federal laws A list of measures implemented to reduce effects to the species during construction and implementation Fact sheets conveying this information and an educational brochure containing color photographs of all special-status species potentially present shall be prepared for distribution to all construction personnel. Construction personnel shall be instructed to halt construction activities and contact the designated biologist if a wildlife species is observed in an area where it could be harmed by construction activities. A list of employees who attend the training sessions shall be maintained by the City of Calistoga and made available to USFWS, NOAA Fisheries, and/or CDFW upon request. 			
MM BIO-3: Amphibians and Reptiles No more than 24 hours prior to the date of initial ground disturbance, a preconstruction survey for foothill yellow-legged frog (FYLF) and northwestern pond turtle (NPT) shall be conducted by a qualified biologist at the project site. The survey shall consist of walking the BSA limits of Conn Creek and at least 400 feet beyond in order to ascertain the possible presence of FYLF and NPT. The biologist shall investigate all potential areas that could be used by the species for feeding, sheltering, movement, and other essential behaviors. This includes an adequate examination of mammal burrows, such as those of California ground squirrels or pocket gophers. If any special-status amphibians or reptiles are found, the biologist shall follow the procedures specified below.	All work areas	 Conduct preconstruction survey no more than 24 hours before the date of beginning ground disturbance activities. Install exclusion fencing around work areas and access routes. 	 The City Qualified biologist Contractor
• Temporary exclusion fencing shall be installed around the limits of work areas and access routes to ensure special-status amphibians and reptiles cannot enter the work area. Installation of exclusion fencing shall occur under the supervision of a designated biologist and immediately following a clearance survey of the area. The exclusion fencing shall have a minimum aboveground height of 30 inches, and the bottom of the fence shall be keyed in at least 4 inches deep and backfilled with soil to prevent wildlife from passing under the fencing.			

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
Initial ground-disturbing activities shall be avoided between November 1 and March 31 to avoid the time period when amphibians and reptiles are most likely to be moving through the project area. To the maximum extent practicable, no construction activities shall occur during rain events or within 24-hours following a rain event. Prior to construction activities resuming, a designated biologist shall inspect the project area and all equipment/materials for the presence of FYLF or NPT. Plastic monofilament netting (erosion control matting), loosely woven netting, or similar material in any form shall not be used at the project site because amphibians and reptiles can become entangled and trapped in them. Any such material found on-site shall be immediately removed by the construction personnel. Materials utilizing fixed weaves (strands cannot move), polypropylene, polymer, or other synthetic materials shall not be used. Uneaten human food and other refuse attracts crows, ravens, coyotes, raccoons, and other predators of FYLF, NPT, and other wildlife. A litter control program shall be instituted at the project site. All workers shall ensure their food scraps, paper wrappers, food containers, cans, bottles, and other trash are deposited in covered or closed garbage containers. The garbage containers shall be removed from the project site at the end of each working day. If a FYLF or NPT is encountered during project activities, all work within the vicinity of the species shall be halted until the biologist determines the species is at risk of injury). If the biologist determines relocation is necessary, the biologist shall be given sufficient time to move the animal from the work site before any work resumes. If the biologist determines relocation is not necessary, the biologist shall monitor the species until it leaves the project vicinity.			
MM BIO-4: Swainson's Hawk Protocol Survey A Swainson's hawk nesting survey shall be implemented to avoid impacts to nesting Swainson's hawk from project activities conducted during the Swainson's hawk nesting period (March to October). The survey shall follow the	All work areas	 Conduct surveys at least two survey periods prior to project initiation 	 The City Qualified biologist CDFW

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
protocol defined in Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (Swainson's Hawk Technical Advisory Committee, 2000). Surveys shall be conducted for at least two survey periods (defined in the protocol) immediately prior to project initiation. Surveys shall be conducted within a 0.5-mile radius around all project		 Consult with CDFW regarding potential take of the species if active nests are discovered 	
 activities. If active nesting is identified within the 0.5-mile radius, the City shall consult with CDFW regarding potential take of the species and shall obtain an Incidental Take Permit, if necessary. 			
MM BIO-5: Nesting Bird Avoidance Measures Discourage Nesting on Conn Creek Bridge	All work areas, and in riparian	Remove inactive nests between October and	The City Qualified biologist
To discourage bird nesting on the existing bridge during construction, existing inactive bird nests and partially constructed nests on Conn Creek Bridge shall be surveyed by a qualified biologist prior to their removal and removed prior to the nesting season (October to February). Techniques to prevent nest establishment include:	vegetation around the active site.	 February Conduct surveys within 7 days before the start of construction 	Contractor
 Nest Removal: Starting before the nesting season (i.e., prior to February 1), the City or its contractor shall visit the site weekly and remove partially completed nests on the bridge using either hand tools or high-pressure water. Disturbance or removal of active nests shall not be conducted at any time (California Fish and Game Code - FGC § 3503 prohibits the destruction of nest or eggs of any bird, except as otherwise provided by Fish and Game Code). 			
Avoidance of Active Nests			
Nesting birds and their nests shall be protected during construction by use of the following measures:			
 Removal of riparian vegetation and trimming shall occur outside the bird nesting season (February 1 to August 30), to the extent feasible. 			
 A qualified wildlife biologist shall conduct pre-construction nesting surveys: 			

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
 within 3 days prior to the start of underground pipeline installation activities; within 3 days prior to the start of construction activities within Conn Creek; and after any construction breaks of 7 days or more. Surveys shall be performed for the project site and suitable habitat within 250 feet of the project site in order to locate any active passerine (perching bird) nests and within 500 feet of the project site to locate any active raptor (birds of prey) nests. If active nests are located during the pre-construction bird nesting surveys, the wildlife biologist shall evaluate if the schedule of construction activities could affect the active nests and the following measures shall be implemented based on their determination: 			
 If construction is not likely to affect the active nest, it may proceed without restriction; however, a biologist shall regularly monitor the nest to confirm there is no adverse effect and may revise their determination at any time during the nesting season. In this case, the following measure would apply: If construction may affect the active nest, the biologist shall establish a nodisturbance buffer. Typically, these buffer distances are between 100 feet and 250 feet for passerines and between 300 feet and 500 feet for raptors. These distances may be adjusted depending on the level of surrounding ambient activity (e.g., if the project site is adjacent to a road or community development) or if an obstruction, such as a tree or building, obscures line-of-sight between the nest and construction. For bird species that are regulated as federal and/or State sensitive species (i.e., fully protected, endangered, threatened, species of special concern), a City representative, supported by the wildlife biologist, shall confer with the USFWS and/or CDFW regarding modifying nest buffers and allowable construction within the buffer. 			
 To be evaluated on a case-by-case basis, birds that begin nesting within the project site and survey buffers amid construction activities shall be assumed to be habituated to construction-related or similar noise and disturbance 			

Mitigation Measures	Applicable	Monitoring/Reporting Action	Responsible and
wildyadon weasures	Locations	Monitoring/neporting Action	Involved Parties
levels and minimum work exclusion zones of 25 feet shall be established around active nests in these cases.			
MM BIO-6: Roosting Special-status Bat Protection	All work areas	 Conduct surveys prior to any 	• The City
A qualified biologist shall conduct a bat habitat assessment of the Conn Creek Bridge and all trees that will be trimmed 30 to 90 days prior to construction in advance of tree trimming to characterize potential bat habitat and identify active roost sites. Should potential roosting habitat or active bat roosts be found on the bridge or in trees to be disturbed, the following measures shall be implemented:		 tree trimming activities Conduct tree trimming in accordance with the specified procedure 	Qualified biologist
Conn Creek Bridge			
If bats, or evidence of their presence is detected during the habitat assessment, CDFW shall be notified within 48 hours and the qualified biologist shall prepare an Avoidance and Minimization plan for CDFW review and written approval, prior to Project construction.			
Free Habitats			
 Suitable bat roosting habitat (i.e., cavities, crevices, deep bark fissures), such tree limbs shall be flagged or otherwise clearly marked, and CDFW shall be notified prior to Project construction. In this event, trimming shall not proceed without approval in writing from CDFW. 			
If any trees containing suitable bat roosting habitat need to be removed, all trees containing such habitat shall be clearly marked and removed during the above seasonal periods of bat activity using the following two-step method. On day 1, in the afternoon, under the supervision of a qualified biologist, all limbs not containing suitable bat roosting habitat (e.g., cavities, crevices, deep bark fissures) shall be removed using chainsaws only. The next day, the rest of the tree shall be removed.			
• Trimming of trees shall occur when bats are active, approximately between the periods of March 1 to April 15, prior to the formation of maternity colonies, and from September 1 to October 15 to avoid winter torpor bats. Disturbance to roosting habitat shall only occur after a qualified biologist has surveyed the tree using a methodology approved by the CDFW to determine whether bats are present in the limbs to be removed.			

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
Cultural I	Resources		
MM CUL-1: Previously Unidentified Cultural Resources Cultural Resources Training A professional archeologist shall provide cultural resources training to all employees and contractors prior to any ground-disturbing activities, including grading, saw-cutting, or excavation. The training shall address appropriate work practices necessary to effectively implement the mitigation measures for historical resources, archaeological resources, tribal cultural resources, and human remains. The training shall train construction personnel on the potential for exposing subsurface resources, recognizing basic signs of a potential resource, understanding required procedures if a potential resource is identified (including reporting the resource to a qualified archaeologist or cultural resources specialist), and understanding all procedures required under Health and Safety Code § 7050.5 and PRC §§ 5097.94, 5097.98, and 5097.99 for the discovery of human remains. Workers shall be specifically instructed to:	All work areas	Train employees and contractors to recognize basic signs of a potential resource and implement the mitigation measures	 The City Qualified cultural resource specialist/archaeologist All construction personnel
 Leave all potential cultural resources (i.e., historical resource, archaeological resource, tribal cultural resource, or human remains) where they are found. Avoid all vehicle access within the boundary of an environmentally sensitive area. 			
The training shall take place during the worker environmental awareness training required in MM BIO-2.			
Procedures for Resource Discovery In the event that a previously unidentified cultural resource is discovered during project implementation, all work within 100 feet of the discovery shall be halted. The resource shall be located, identified, and recorded in the updated California Department of Parks and Recreation 523 form detailing current conditions. Data regarding archaeological resources shall be shared with Native American tribes identified by the Native American Heritage Commission (NAHC) to be traditionally and culturally affiliated with the geographic area.			
A qualified cultural resource specialist/archaeologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be			

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
avoided and no further impacts shall occur, the resource shall be documented on California State Department of Parks and Recreation cultural resource record forms and no further effort shall be required. If work must commence in the sensitive area, a 100-foot radius surrounding each known cultural resource site shall be flagged by a qualified cultural resource specialist/archaeologist and designated as an environmentally sensitive area. Alternatively, the cultural resource specialist/archaeologist shall evaluate the resource and determine whether it is:			
 Eligible for the CRHR (and a historical resource for purposes of CEQA); A unique archaeological resource as defined by CEQA; or 			
 A potential tribal cultural resource (all archaeological resources could be a tribal cultural resource). 			
If the cultural resources specialist/archaeologist determines that the resource could be a tribal cultural resource, he or she shall, within 48 hours of the discovery, notify each Native American tribe identified by the NAHC to be traditionally and culturally affiliated with the geographic area of the site of the discovery. A tribal monitor shall inspect the resource to determine whether it constitutes a tribal cultural resource. If the resource is determined not to be a unique archaeological resource, an historical resource, or a potential tribal cultural resource, work may commence in the area.			
If the resource meets the criteria for a historical resource, unique archaeological resource, and/or tribal cultural resource, work shall remain halted and the cultural resources specialist/archaeologist shall consult with the City staff regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA Guidelines Section 15064.5(b). The responding tribes shall be given an opportunity to participate in determining the appropriate mitigation methods for tribal cultural resources in consultation with the City.			
Avoidance of the area, or avoidance of impacts on the resource, is the preferred method of mitigation for impacts on cultural resources and shall be required unless there are other equally effective methods and avoidance is not feasible. Work may commence upon completion of evaluation, collection, recordation,			

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
and analysis, as approved by the qualified cultural resource specialist/archaeologist and tribal monitor, for tribal cultural resources.	Locations		ilivoiveu Farties
Transp	ortation		
MM TRAN-1: Traffic Control Plan	All work areas	Prepare TCP	The City
To ensure that construction of the project does not adversely interfere with local traffic safety and circulation, a Traffic Control Plan (TCP) shall be prepared for the project. The TCP shall be subject to review and approval by the City of Calistoga, Napa County, and Caltrans (District 4), and shall include, but not be limited to the following elements:			CaltransContractor
 The contractor shall provide flaggers as needed to temporarily hold traffic to safely stage equipment in advance of and/or during construction. 			
• The contractor shall coordinate with the Napa County Police Department to ensure that construction activities, including temporary closure of the eastbound lane on Conn Creek Bridge, as well as the movement, staging, and storage of materials in and near the proposed staging areas do not interfere with law enforcement activities, emergency response, or evacuation procedures.			
The contractor shall install advance warning signs to alert bicyclists and Silverado Trail users of the work zone and temporary detours. Advance warning signs may include reflective signs, cones, or barricades. Signage should state the anticipated duration for construction, and reflect that the work is scheduled to occur between the hours of 7:00 a.m. to 7:00 p.m., Monday through Friday.			
• Signage shall be installed at both ends of the Silverado Trail segment affected by project construction, directing pedestrians and bicyclists to detours facilities.			
Work shall be confined to the immediate project site and performed in a manner that would be least disruptive to the public.			
 The contractor shall ensure the public has access to businesses and private driveways along Silverado Trail at all times 			

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
Tribal Cultu	ral Resources		
MM TCR-2: Tribal Cultural Resource Sensitivity Training All on-site personnel of the project shall receive adequate tribal cultural resource sensitivity training prepared and administered by the project Tribal Cultural Monitor or his or her authorized designee prior to initiation of ground disturbance activities on the project. The training must address the potential for encountering previously unidentified tribal cultural resources and procedures if a potential tribal cultural resource is identified. The City shall provide the consulting Tribes an opportunity to review and comment on the tribal cultural resource sensitivity training before the training is administered to the crew. The tribal cultural resource sensitivity training will be administered during the cultural resource training described in MM CUL-1.	All work areas	 Provide tribal cultural resource sensitivity training to on-site personnel prior to initiation of ground disturbance activities Coordinate with the consulting Tribes and incorporate the tribal cultural resource sensitivity training into the cultural resource training described in MM CUL-1. 	 The City Consulting Tribes Qualified cultural resource specialist/archaeologist All on-site personnel
Utilities and S	Service Systems		
MM UTIL-1: Public Notification of Utility Service Interruption Prior to construction in which a utility distribution service interruption is known to be unavoidable, the City shall notify members of the public affected by the planned outage at least 10 calendar days prior to the impending interruption for residential and commercial outages.	All work areas	 Notify affected members of the public at least 10 calendar days prior to the interruption 	• The City

Table F-2 Mitigation Measures – During Construction

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
Air (Quality		
MM AIR-1: Implement Dust Control Measures	All work areas	Water twice per day	The City
The following dust control measures shall be implemented during construction of the project.		Cover haul trucks	 Contractor

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
 All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day when track-out is evident. The use of dry power sweeping is prohibited. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. Construction equipment shall be properly maintained by a certified mechanic. Post a publicly visible sign with the telephone number and person to contact at the City of Calistoga regarding dust complaints. This person shall respond and take corrective action within 48 hours. BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations 		 Remove mud and dirt track-out with wet power vacuum street sweepers Minimize idling times Maintain construction equipment Post sign with contact information for dust complaints 	
Biological	Resources		
MM BIO-1: Special-status Plants Within one year prior to construction, a qualified botanist shall survey all potentially impacted project areas for special-status plants during the blooming season (roughly June through October), with particular emphasis on oak woodlands where Napa false indigo and Napa bluecurls may occur. Surveys shall be conducted in accordance with CDFW's Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities (California Natural Resource Agency Department of Fish and Wildlife, 2018). All special-status plants observed within project impact areas shall be flagged in the field, photographed, and the Global Positioning System coordinates shall be recorded. Special-status plants shall be avoided during construction.	All work areas	Conduct monitoring in accordance with the Mitigation and Monitoring Plan	 The City Qualified botanist CDFW botanical staff

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
In the event that special-status plants species are discovered during surveys and cannot be avoided during project construction, a qualified biologist shall prepare a mitigation and monitoring plan for CDFW review and approval prior to starting project construction. The plan shall consider the potential for impacts to all special status plant species including Napa false indigo and Napa bluecurls.			
Mitigation and Monitoring Plan			
1. The mitigation and monitoring plan shall include but not be limited to:			
 An onsite habitat enhancement and planting plan, and off-site planting if there is not suitable habitat within the Project area to support a 3:1 individual plants planted to individual plants removed ratio; 			
3. Success criteria,			
4. A minimum of 5 years of monitoring, and			
Control of invasive species and any other practice to ensure plantings achieve success criteria.			
A long-term management plan shall be prepared and implemented, funding shall			
be provided for management of the protected lands in perpetuity pursuant to the			
long-term management plan, and a land manager shall be designated prior to Project construction. Alternatively, the City of Calistoga could provide a financial			
security, such as a letter of credit, to an accredited Land Trust such for			
implementing the habitat protection described above. If a security is provided,			
the conservation easement shall be recorded within 18 months of the initiation			
of Project construction. The Land Trust will hold the security until the City			
satisfies all obligations of the Mitigation and Monitoring Plan, including			
achieving success criteria. Alternatively, the Mitigation and Monitoring Plan can include preservation of habitat of equal or greater habitat value than the Project			
area for the rare plant species impacted by the Project, as determined by a			
qualified botanist. The preservation area must be protected under a			
conservation easement prior to construction with the same requirements for			

long-term management as outlined above.

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
No more than 24 hours prior to the date of initial ground disturbance, a preconstruction survey for foothill yellow-legged frog (FYLF) and northwestern pond turtle (NPT) shall be conducted by a qualified biologist at the project site. The survey shall consist of walking the BSA limits of Conn Creek and at least 400 feet beyond in order to ascertain the possible presence of FYLF and NPT. The biologist shall investigate all potential areas that could be used by the species for feeding, sheltering, movement, and other essential behaviors. This includes an adequate examination of mammal burrows, such as those of California ground squirrels or pocket gophers. If any special-status amphibians or reptiles are found, the biologist shall follow the procedures specified below. • Temporary exclusion fencing shall be installed around the limits of work areas and access routes to ensure special-status amphibians and reptiles cannot enter the work area. Installation of exclusion fencing shall occur under the supervision of a designated biologist and immediately following a clearance survey of the area. The exclusion fencing shall have a minimum aboveground height of 30 inches, and the bottom of the fence shall be keyed in at least 4 inches deep and backfilled with soil to prevent wildlife from passing under the fencing. • Initial ground-disturbing activities shall be avoided between November 1 and March 31 to avoid the time period when amphibians and reptiles are most likely to be moving through the project area. • To the maximum extent practicable, no construction activities shall occur during rain events or within 24-hours following a rain event. Prior to construction activities resuming, a designated biologist shall inspect the project area and all equipment/materials for the presence of FYLF or NPT. • Plastic monofilament netting (erosion control matting), loosely woven netting, or similar material in any form shall not be used at the project site because amphibians and reptiles can become entangled and trapped in th	All work areas	 Cease activities during rain events or within 24 hours following a rain event Inspect the project area and all equipment and materials for FYLF or NPT prior to resuming activity If any species are found during activities, all work in the vicinity of the species shall halt until a designated biologist gives permission to proceed 	Designated biologist Contractor

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
• Uneaten human food and other refuse attracts crows, ravens, coyotes, raccoons, and other predators of FYLF, NPT, and other wildlife. A litter control program shall be instituted at the project site. All workers shall ensure their food scraps, paper wrappers, food containers, cans, bottles, and other trash are deposited in covered or closed garbage containers. The garbage containers shall be removed from the project site at the end of each working day. If a FYLF or NPT is encountered during project activities, all work within the vicinity of the species shall be halted until the biologist determines the species is not at risk or the species moves out of the project vicinity. The biologist shall determine if relocating the individual is appropriate (e.g., if the species is at risk of injury). If the biologist determines relocation is necessary, the biologist shall be given sufficient time to move the animal from the work site before any work resumes. If the biologist determines relocation is not necessary, the biologist shall monitor the species until it leaves the project vicinity.			
 MM BIO-5: Nesting Bird Avoidance Measures Discourage Nesting on Conn Creek Bridge To discourage bird nesting on the existing bridge during construction, existing inactive bird nests and partially constructed nests on Conn Creek Bridge shall be surveyed by a qualified biologist prior to their removal and removed prior to the nesting season (October to February). Techniques to prevent nest establishment include: Nest Removal: Starting before the nesting season (i.e., prior to February 1), the City or its contractor shall visit the site weekly and remove partially completed nests on the bridge using either hand tools or high-pressure water. Disturbance or removal of active nests shall not be conducted at any time (California Fish and Game Code - FGC § 3503 prohibits the destruction of nest or eggs of any bird, except as otherwise provided by Fish and Game Code). 	All work areas, and in riparian vegetation around the active site.	Activity after breaks lasting more than 7 days may only resume after a survey is conducted	 The City Qualified biologist Contractor
Avoidance of Active Nests			
Nesting birds and their nests shall be protected during construction by use of the following measures:			

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
 Removal of riparian vegetation and trimming shall occur outside the bird nesting season (February 1 to August 30), to the extent feasible. A qualified wildlife biologist shall conduct pre-construction nesting surveys: within 3 days prior to the start of underground pipeline installation activities; within 3 days prior to the start of construction activities within Conn Creek; and after any construction breaks of 7 days or more. Surveys shall be performed for the project site and suitable habitat within 250 feet of the project site in order to locate any active passerine (perching bird) nests and within 500 feet of the project site to locate any active raptor (birds of prey) nests. 			
If active nests are located during the pre-construction bird nesting surveys, the wildlife biologist shall evaluate if the schedule of construction activities could affect the active nests and the following measures shall be implemented based on their determination:			
 If construction is not likely to affect the active nest, it may proceed without restriction; however, a biologist shall regularly monitor the nest to confirm there is no adverse effect and may revise their determination at any time during the nesting season. In this case, the following measure would apply: 			
 If construction may affect the active nest, the biologist shall establish a no-disturbance buffer. Typically, these buffer distances are between 100 feet and 250 feet for passerines and between 300 feet and 500 feet for raptors. These distances may be adjusted depending on the level of surrounding ambient activity (e.g., if the project site is adjacent to a road or community development) or if an obstruction, such as a tree or building, obscures line- 			
of-sight between the nest and construction. For bird species that are regulated as federal and/or State sensitive species (i.e., fully protected, endangered, threatened, species of special concern), a City representative, supported by the wildlife biologist, shall confer with the USFWS and/or CDFW regarding modifying nest buffers and allowable construction within the buffer.			

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
 To be evaluated on a case-by-case basis, birds that begin nesting within the project site and survey buffers amid construction activities shall be assumed to be habituated to construction-related or similar noise and disturbance levels and minimum work exclusion zones of 25 feet shall be established around active nests in these cases. 			
MM BIO-6: Roosting Special-status Bat Protection	All work areas	Conduct tree trimming in	• The City
A qualified biologist shall conduct a bat habitat assessment of the Conn Creek Bridge and all trees that will be trimmed 30 to 90 days prior to construction in advance of tree trimming to characterize potential bat habitat and identify active roost sites. Should potential roosting habitat or active bat roosts be found on the bridge or in trees to be disturbed, the following measures shall be implemented:		accordance with the specified procedure	 Qualified biologist Contractor
Conn Creek Bridge			
If bats, or evidence of their presence is detected during the habitat assessment, CDFW shall be notified within 48 hours and the qualified biologist shall prepare an Avoidance and Minimization plan for CDFW review and written approval, prior to Project construction.			
Tree Habitats			
 Suitable bat roosting habitat (i.e., cavities, crevices, deep bark fissures), such tree limbs shall be flagged or otherwise clearly marked, and CDFW shall be notified prior to Project construction. In this event, trimming shall not proceed without approval in writing from CDFW. 			
• If any trees containing suitable bat roosting habitat need to be removed, all trees containing such habitat shall be clearly marked and removed during the above seasonal periods of bat activity using the following two-step method. On day 1, in the afternoon, under the supervision of a qualified biologist, all limbs not containing suitable bat roosting habitat (e.g., cavities, crevices, deep bark fissures) shall be removed using chainsaws only. The next day, the rest of the tree shall be removed.			
 Trimming of trees shall occur when bats are active, approximately between the periods of March 1 to April 15, prior to the formation of maternity colonies, and from September 1 to October 15 to avoid winter torpor bats. Disturbance to roosting habitat shall only occur after a qualified biologist has surveyed the 			

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
tree using a methodology approved by the CDFW to determine whether bats are present in the limbs to be removed.			
Cultural I	Resources		
MM CUL-1: Previously Unidentified Cultural Resources Cultural Resources Training A professional archeologist shall provide cultural resources training to all employees and contractors prior to any ground-disturbing activities, including grading, saw-cutting, or excavation. The training shall address appropriate work practices necessary to effectively implement the mitigation measures for historical resources, archaeological resources, tribal cultural resources, and human remains. The training shall train construction personnel on the potential for exposing subsurface resources, recognizing basic signs of a potential resource, understanding required procedures if a potential resource is identified (including reporting the resource to a qualified archaeologist or cultural resources specialist), and understanding all procedures required under Health and Safety Code § 7050.5 and PRC §§ 5097.94, 5097.98, and 5097.99 for the discovery of human remains. Workers shall be specifically instructed to: • Leave all potential cultural resources (i.e., historical resource, archaeological resource, tribal cultural resource, or human remains) where they are found. • Avoid all vehicle access within the boundary of an environmentally sensitive area. The training shall take place during the worker environmental awareness training required in MM BIO-2. Procedures for Resource Discovery In the event that a previously unidentified cultural resource is discovered during project implementation, all work within 100 feet of the discovery shall be halted. The resource shall be located, identified, and recorded in the updated California Department of Parks and Recreation 523 form detailing current conditions. Data regarding archaeological resources shall be shared with Native American tribes identified by the Native American Heritage Commission (NAHC) to be traditionally and culturally affiliated with the geographic area.	All work areas	 Cease activity if a cultural resource is uncovered Avoid resource if possible Evaluate and determine whether the resource is eligible, unique, or could be a tribal cultural resource If the resource could be a tribal cultural resource, notify the Native American tribe identified by the NAHC to be traditionally and culturally affiliated with the geographic area of the site If the resource is not eligible, unique, and/or a tribal cultural resource, work may resume If the resource is eligible, unique, and/or a tribal cultural resource, work remains halted and a method selected to ensure that adverse change to the resource does not occur Preserve in place, if possible, or if not possible to preserve in place, and as deemed appropriate by the 	 The City NAHC Qualified cultural resource specialist/archaeologist Tribal monitor All construction personnel

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
A qualified cultural resource specialist/archaeologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts shall occur, the resource shall be documented on California State Department of Parks and Recreation cultural resource record forms and no further effort shall be required. If work must commence in the sensitive area, a 100-foot radius surrounding each known cultural resource site shall be flagged by a qualified cultural resource specialist/archaeologist and designated as an environmentally sensitive area. Alternatively, the cultural resource specialist/archaeologist shall evaluate the resource and determine whether it is: • Eligible for the CRHR (and a historical resource for purposes of CEQA);		qualified cultural resource specialist/archaeologist and tribal monitor for tribal cultural resources, recover and record cultural materials. Once recovered and recorded, the activity can commence in this area	
 Eligible for the Chris (and a historical resource for purposes of CEGA), A unique archaeological resource as defined by CEQA; or A potential tribal cultural resource (all archaeological resources could be a tribal cultural resource). 			
If the cultural resources specialist/archaeologist determines that the resource could be a tribal cultural resource, he or she shall, within 48 hours of the discovery, notify each Native American tribe identified by the NAHC to be traditionally and culturally affiliated with the geographic area of the site of the discovery. A tribal monitor shall inspect the resource to determine whether it constitutes a tribal cultural resource. If the resource is determined not to be a unique archaeological resource, an historical resource, or a potential tribal cultural resource, work may commence in the area.			
If the resource meets the criteria for a historical resource, unique archaeological resource, and/or tribal cultural resource, work shall remain halted and the cultural resources specialist/archaeologist shall consult with the City staff regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA Guidelines Section 15064.5(b). The responding tribes shall be given an opportunity to participate in determining the appropriate mitigation methods for tribal cultural resources in consultation with the City.			
Avoidance of the area, or avoidance of impacts on the resource, is the preferred method of mitigation for impacts on cultural resources and shall be required			

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
unless there are other equally effective methods and avoidance is not feasible. Work may commence upon completion of evaluation, collection, recordation, and analysis, as approved by the qualified cultural resource specialist/archaeologist and tribal monitor, for tribal cultural resources.			
MM CUL-2: Discovery of Human Remains If human remains and associated or unassociated funerary objects are exposed during implementation of the project, work within 100 feet of the discovery shall be halted and the find protected from further disturbance. The Napa County Coroner shall be notified immediately and, in the event of the determination that the human remains are Native American remains, notification of the Native American Heritage Commission shall be undertaken to obtain a most likely descendant (MLD) (PRC § 5097.98) for treatment recommendations. The City and the MLD shall make all reasonable efforts to develop an agreement for the treatment of human remains and associated or unassociated funerary objects with appropriate dignity (CEQA Guidelines Section 15064.5[d]). The agreement shall take into consideration the appropriate removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. Any findings shall be submitted in a report to the MLD and filed with the Central California Information Center (CCIC).	All work areas	 Cease activity if human remains are uncovered Appoint an MLD Protect human remains until a decision is reached If avoidance is not possible, the Napa County Coroner, a professional archaeologist, and an MLD shall be consulted and human remains and associated or unassociated funerary objects shall be removed from the location and relocated to selected location in accordance with the decision reached. Once remains are moved, then the activity can resume in this area 	 The City Napa County Coroner MLD Contractor
Hazards and Haz	ardous Materials		
MM HAZ-1: Fire Safety Procedures The City and/or its contractor shall implement the following fire prevention procedures to reduce the potential risk of fire ignitions during construction: • The City and/or its contractors shall check in daily by phone for the National Weather Service daily fire hazard rating for the area. On days when the fire	All work areas	 Check National Weather Service daily fire hazard rating No work on red flag days Use of spark arrestors 	The CityContractorAll construction personnel

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
 hazard rating is "Very High" or "Critical," use of two-stroke power tools, such as chainsaws and weed whips, shall be prohibited at the project site. No work shall occur on red flag days declared by Napa County. Earthmoving and portable equipment with internal combustion engines shall be equipped with a spark arrestor to reduce the potential for igniting a wildland fire. Appropriate fire suppression equipment shall be maintained and available at the construction site. Flammable materials shall be removed to a distance of 10 feet from any equipment that is either operating, a significant heat source, or which could produce a spark, fire, or flame. Construction personnel shall be trained in fire safe work practices (e.g., smoking in enclosed spaces or parking in designated parking locations), use of fire suppression equipment, and procedures to follow in the event of a fire, including use of emergency radios provided by the City. 		 Fire suppression equipment is available Move flammable materials from heat source Train construction personnel in fire safe work practices 	
Transp	ortation		
MM TRAN-1: Traffic Control Plan To ensure that construction of the project does not adversely interfere with local traffic safety and circulation, a Traffic Control Plan (TCP) shall be prepared for the project. The TCP shall be subject to review and approval by the City of Calistoga, Napa County, and Caltrans (District 4), and shall include, but not be limited to the following elements: • The contractor shall provide flaggers as needed to temporarily hold traffic to safely stage equipment in advance of and/or during construction. • The contractor shall coordinate with the Napa County Police Department to ensure that construction activities, including temporary closure of the eastbound lane on Conn Creek Bridge, as well as the movement, staging, and storage of materials in and near the proposed staging areas do not interfere with law enforcement activities, emergency response, or evacuation procedures.	All work areas	Implement TCP	 The City Caltrans Contractor

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
 The contractor shall install advance warning signs to alert bicyclists and Silverado Trail users of the work zone and temporary detours. Advance warning signs may include reflective signs, cones, or barricades. Signage should state the anticipated duration for construction, and reflect that the work is scheduled to occur between the hours of 7:00 a.m. to 7:00 p.m., Monday through Friday. Signage shall be installed at both ends of the Silverado Trail segment affected by project construction, directing pedestrians and bicyclists to detours facilities. Work shall be confined to the immediate project site and performed in a manner that would be least disruptive to the public. The contractor shall ensure the public has access to businesses and private driveways along Silverado Trail at all times 			
	ral Resources		
MM TCR-1: Tribal Monitoring During the construction phase and prior to initial ground disturbance, the City or its contractor shall retain a project Tribal Cultural Monitor familiar with tribal resources of the Middletown Rancheria of Pomo Indians of California and Mishewal Wappo Indians of Alexander Valley (hereafter "consulting Tribes"). Ground disturbing activities occurring in conjunction with the project (including, debris removal, rescrapes, erosion control [mulching, waddles, hydroseeding, etc.], pot-holing or auguring, boring, grading, trenching, foundation work and other excavations or other ground disturbance involving the moving of dirt or rocks with heavy equipment or hand tools within the project area) shall be monitored on a full-time basis by the Tribal Cultural Monitor. A Qualified Tribal Cultural Monitor(s) shall be defined as an individual(s) who has experience with identification, collection and treatment of tribal cultural resources of value to the Tribes traditionally and culturally affiliated with the project area. The duration of tribal cultural monitoring is expected to include all project construction phases and to conclude upon completion of construction. If the consulting Tribes determine that full-time monitoring is no longer warranted, tribal monitoring may be reduced to periodic spot-checking or cease entirely.	All work areas	Monitor ground disturbing activities on a full-time basis	 The City Qualified tribal monitor(s) Contractor

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
Tribal monitoring would be reinstated in the event of any new or unforeseen ground disturbances or discoveries.			
MM TCR-3: Tribal Cultural Resources Discovery and Treatment Procedures The project tribal monitor may halt ground disturbance activities in the immediate area of discovery when known or suspected tribal cultural resources are identified until further evaluation can be made in determining their significance and appropriate treatment or disposition. There must be at minimum one tribal monitor for every separate area of ground disturbance activity that is at least 30 meters or 100 feet apart unless otherwise agreed upon in writing between the consulting Tribes and the City. Depending on the scope and schedule of ground disturbance activities of the project (e.g., discoveries of cultural resources or simultaneous activities in multiple locations that requires multiple tribal monitors, etc.) additional tribal monitors may be required on-site. If additional tribal monitors are needed, the consulting Tribes shall be provided with a minimum of three (3) business days advance notice unless otherwise agreed upon between the Tribes and the City. The on-site tribal monitoring shall end when the ground disturbance activities are completed, or if/when the consulting Tribes determine the site has a low potential for tribal cultural resources. All potential cultural resources unearthed by project activities shall be evaluated by the project Tribal Cultural Monitor. The consulting Tribes shall be provided the opportunity to inspect and determine the nature of the resource and the best course of action for avoidance, protection and/or treatment of tribal cultural resources to the extent permitted by law. If the resource is determined to be a tribal cultural resource of value to the consulting Tribes, the City shall coordinate with the Tribe to establish appropriate treatment and disposition of the resources with appropriate dignity which may include reburial or preservation of resources. The City must facilitate and ensure that the determination of treatment and disposition by the Tribes is followed to the extent permitted by	All work areas	 Provide the Tribes an opportunity to inspect any unearthed cultural resources and establish appropriate treatment and disposition of the resources Determination of treatment and disposition by the Tribes shall be followed to the extent permitted by law No laboratory studies, scientific analysis, curation, or video recording are permitted for tribal cultural resources without the prior written consent of the Tribes 	 The City Consulting Tribes Tribal monitor(s) Qualified cultural resource specialist/archaeologist

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
as a tribal cultural resource, the treatment of the discovery (including recording methods, laboratory studies, scientific analysis, and/or curation) will be determined by the City in consultation with consulting Tribes, qualified archaeologist, and any other agencies with authority over the project.			

Table F-3 Mitigation Measures – After Construction

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
Biological Resources			
Within one year prior to construction, a qualified botanist shall survey all potentially impacted project areas for special-status plants during the blooming season (roughly June through October), with particular emphasis on oak woodlands where Napa false indigo and Napa bluecurls may occur. Surveys shall be conducted in accordance with CDFW's Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities (California Natural Resource Agency Department of Fish and Wildlife, 2018). All special-status plants observed within project impact areas shall be flagged in the field, photographed, and the Global Positioning System coordinates shall be recorded. Special-status plants shall be avoided during construction.	All replanting and reseeding areas	 Implement Monitoring Plan and Long-term Management Plan, if necessary. 	 The City Qualified biologist
In the event that special-status plants species are discovered during surveys and cannot be avoided during project construction, a qualified biologist shall prepare a mitigation and monitoring plan for CDFW review and approval prior to starting project construction. The plan shall consider the potential for impacts to all special status plant species including Napa false indigo and Napa bluecurls.			
Mitigation and Monitoring Plan			
1. The mitigation and manitaring plan shall include but not be limited to:			

1. The mitigation and monitoring plan shall include but not be limited to:

Mitigation Measures	Applicable Locations	Monitoring/Reporting Action	Responsible and Involved Parties
 An onsite habitat enhancement and planting plan, and off-site planting if there is not suitable habitat within the Project area to support a 3:1 individual plants planted to individual plants removed ratio; 			
3. Success criteria,			
4. A minimum of 5 years of monitoring, and			
Control of invasive species and any other practice to ensure plantings achieve success criteria.			
A long-term management plan shall be prepared and implemented, funding shall be provided for management of the protected lands in perpetuity pursuant to the long-term management plan, and a land manager shall be designated prior to Project construction. Alternatively, the City of Calistoga could provide a financial security, such as a letter of credit, to an accredited Land Trust such for implementing the habitat protection described above. If a security is provided, the conservation easement shall be recorded within 18 months of the initiation of Project construction. The Land Trust will hold the security until the City satisfies all obligations of the Mitigation and Monitoring Plan, including achieving success criteria. Alternatively, the Mitigation and Monitoring Plan can include preservation of habitat of equal or greater habitat value than the Project area for the rare plant species impacted by the Project, as determined by a qualified botanist. The preservation area must be protected under a conservation easement prior to construction with the same requirements for long-term management as outlined above.			