

Southern California Edison's Banducci Substation Project

Application A.12-11-011

Decision D.15-06-009

MITIGATION MONITORING, COMPLIANCE, AND REPORTING PROGRAM

Prepared for
California Public Utilities Commission



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1. Introduction

1.1 Project Overview

The Southern California Edison (SCE) Banducci Substation Project (Project) (Application No. A.12-11-011) includes the following components:

- Construction of a new Banducci 66/12 kilovolt (kV) Substation. Banducci Substation would be an unstaffed, automated, 56.0 megavolt-ampere (MVA), low-profile substation with a potential capacity of 112 MVA at final buildout. The proposed 66/12 kV distribution substation would be located on an approximately 6.3 acre parcel in the unincorporated Cummings Valley area of Kern County.
- Construction of two new 66 kV subtransmission line segments that would loop the existing Correction-Cummings–Kern River 1 66 kV Subtransmission Line: one that would enter and one that would exit the proposed Banducci Substation creating the new Banducci–Kern River 1 66 kV Subtransmission Line and the new Banducci-Correction-Cummings 66 kV Subtransmission Line.
- Construction of three new underground 12 kV distribution getaways.
- Installation of telecommunications facilities to connect the proposed Banducci Substation to SCE's existing telecommunications system.

The Banducci Substation site is located at the southeast corner of Pellisier Road and unimproved Dale Road in unincorporated Cummings Valley, Kern County. The subtransmission line upgrades would occur on new and replacement poles along Pellisier Road in close proximity to the substation. Telecommunications upgrades would include installation of fiber optic cable within existing SCE rights-of-way, overhead on existing and replacement poles and underground in existing and new underground conduit. A total of approximately 32 miles of fiber optic cable would be installed between the proposed Banducci Substation and the existing Cummings and Monolith Substations, both near the City of Tehachapi, Kern County. Figure 1 provides an overview of the Project configuration.

A detailed project description, including figures, is provided in Attachment A.

1.2 Authority

The California Public Utilities Commission (CPUC) has broad regulatory authority under Article XII of the California Constitution, and Section 702 of the Public Utilities Code (PU Code) mandates that every public utility obey and comply with every order, decision, direction or rule made by the Commission. Public utilities are subject to enforcement action and fines pursuant to PU Code Sections 2102-1015, 2017, 2108, and 2114. In 2013, the CPUC established a CEQA Citation Program authorizing Staff to fine public utilities for non-compliance with Permits to Construct (PTCs) and Certificates of Public Convenience and Necessity (CPCNs). MMCRPs are adopted as part of PTCs and CPCNs and are enforced as such.

Monitoring of mitigation measures to be implemented by a project is required by the California Environmental Quality Act (CEQA). CEQA Guidelines Section 15097 clarifies requirements for mitigation monitoring or reporting. As well, Section 21081.6 of the California Public Resources Code (PRC) requires a public agency to adopt a mitigation monitoring and reporting program when it approves a project that is subject to preparation of an Environmental Impact Report (EIR) or Mitigated Negative Declaration (MND) and where significant adverse environmental effects have been identified.

SCE Banducci Substation Project
MITIGATION MONITORING, COMPLIANCE, AND REPORTING PROGRAM

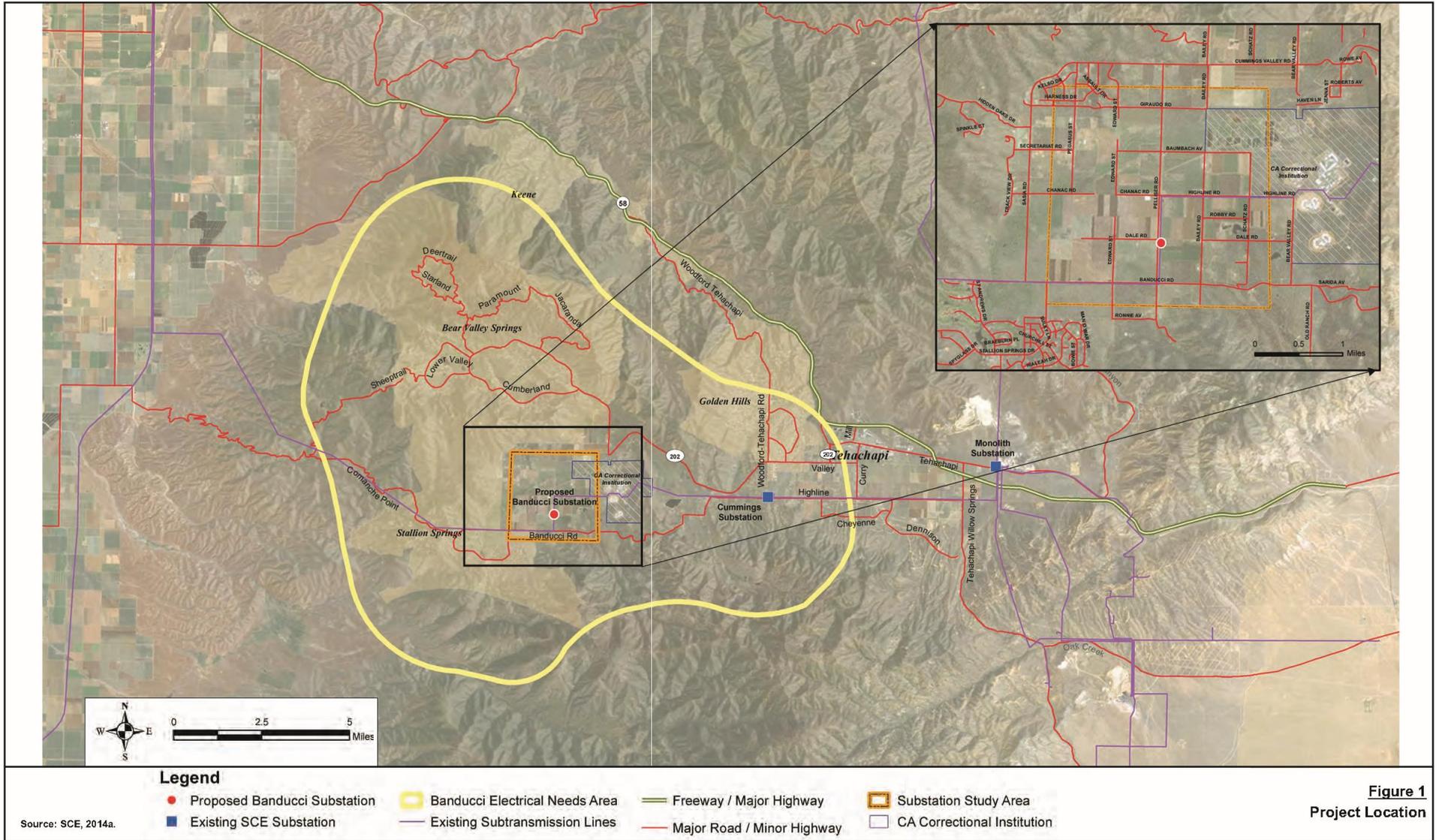


Figure 1
Project Location

Mitigation measures to be implemented as part of the Project were identified in the Final MND and Supporting Initial Study (IS/MND) prepared by CPUC for the Project. The IS/MND was adopted by the California Public Utilities Commission (CPUC) on June 11, 2015 in Decision D.15-06-009 and includes procedures for preparing and implementing a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) to ensure compliance with the mitigation measures approved in the IS/MND. In addition, Applicant Proposed Measures (APMs) were adopted as part of the IS/MND. Together, the mitigation measures and APMs identified in the MND provide the framework for this MMCRP.

1.3 Mitigation Monitoring, Compliance, and Reporting Plan

Within SCE's application, the utility proposed APMs to reduce potentially significant adverse impacts related to project construction and operation. In addition, mitigation measures are imposed on the Project by the CPUC and regulatory agencies may impose permit requirements.

The MMCRP provides guidelines and procedures for environmental compliance on the Project. The MMCRP was developed by CPUC in coordination with SCE and CPUC's Environmental Monitors (CPUC EMs). The MMCRP defines reporting relationships, provides information regarding the roles and responsibilities of the Project's environmental compliance personnel, sets out compliance reporting procedures, and establishes a communication protocol. The communication information listed in the MMCRP will be updated throughout construction.

The purpose of this MMCRP is to ensure effective implementation of the mitigation measures and APMs identified in the IS/MND and imposed by the CPUC as part of project approval. It describes the logistics of the monitoring process and establishes protocols to be followed by CPUC's third-party EMs and SCE project staff. This MMCRP includes:

- APMs¹ and mitigation measures that SCE must implement as part of the Project;
- Actions required to implement these measures;
- Monitoring requirements;
- Timing of implementation for each measure.
- Procedures for approving minor project changes; and
- Procedures for dispute resolution;

Section 6 lists the APMs and mitigation measures, the timing for completion, and whether CPUC review or approval is required before construction can commence.

A draft version of the MMCRP was distributed to SCE and CPUC EMs for review and comment. The final language of the MMCRP was established in consultation with SCE.

¹ As stated in Section 4.14 of the Final IS/MND, SCE's originally proposed APMs are superseded by various mitigation measures summarized in Section 6 of the IS/MND. The mitigation measures referenced in the IS/MND and in Section 6 of this MMCRP either expand upon or add detail to the APMs, and for the purposes of the Project, supersede the APMs.

1.4 Agencies with Jurisdiction

The CPUC is the Lead Agency for the Project. However, the project affects resources or requires activities that are under the jurisdiction of or regulated by other agencies. These agencies that may require separate permits or approvals are listed in Table 1. Contact information for individual agencies is provided in Table 2.

All required permits are to be secured by SCE and their terms and conditions implemented prior to undertaking any work that requires such permits. CPUC’s EM will be provided copies of every permit secured and will include permit compliance as part of general environmental monitoring duties. If the CPUC EM observes activities or conditions believed to be in violation of a permit, the CPUC EM has the authority to communicate these observations to the appropriate agency. Under their own authority and at their discretion, permitting agencies may implement their own monitoring and reporting schemes and undertake whatever enforcement actions they are authorized to pursue.

Important: The status of required permits will be included in any SCE request for a Notice to Proceed from the CPUC. Copies of permits, including any permit requirements and stipulations, shall be provided to CPUC.

Table 1. Permits that May Be Required for the SCE Banducci Substation Project

Agency	Jurisdiction	Requirements
FEDERAL / STATE AGENCIES		
California Public Utilities Commission	Construction, modification, or alteration of power line facilities.	Permit to Construct (General Order No. 131-D)
California Department of Transportation	For use of California State highways for other than normal transportation purposes, including construction activities completed within the ROW, pole replacement, utility line crossings, and for use of California Manual of Uniform Traffic Control Devices and Caltrans Standard Plans for traffic control within the ROW.	Standard Encroachment Permit
State Water Resources Control Board (SWRCB)	Construction activities disturbing 1 acre or more of soil must comply with the terms of the NPDES Construction General Permit (CGP) Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-9996-DWQ)..	Submit a Notice of Intent for coverage under the CGP. Prepare and submit a Storm Water Pollution Prevention Plan (SWPPP).
LOCAL / REGIONAL AGENCIES		
Kern County and City of Tehachapi	Roadway Encroachment and/or Transportation Permit	Ministerial approval for possible closure of roads for transportation of heavy or oversized equipment and construction of facilities within public roadway right-of-way
Union Pacific Railroad	Activities in area of railroad	Encroachment permit to cross railroad facilities (telecommunications components)

Table 2. Jurisdictional Agencies Associated with the SCE Banducci Substation Project

Agency	Address	Contact Person	Phone	E-mail Address
LEAD AGENCY				
California Public Utilities Commission	505 Van Ness Avenue San Francisco CA 94102	Jensen Uchida	415-703-5484	Jensen.Uchida@cpuc.ca.gov
FEDERAL AGENCIES				
US Fish and Wildlife Service Region 8	Federal Building 2800 Cottage Way, Room W-2605 Sacramento CA 95825			
STATE AGENCIES				
California Department of Fish and Wildlife Central Region 4	1234 E Shaw Avenue Fresno CA 93710			
California Department of Transportation (Caltrans), District 9	500 S Main Street, Bishop CA 93514			
California Department of Toxic Substances Control – LA Office	9211 Oakdale Avenue Los Angeles, CA 91311		818-717-6500	
State Water Resources Control Board	1001 "I" Street Sacramento, CA 95814		916-341-5536	stormwater@waterboards.ca.gov
LOCAL AND REGIONAL				
Kern County	Kern Co. Administrative Office 1115 Truxtun Avenue, Fifth Floor Bakersfield, CA 93301		661-868-3140	
City of Tehachapi	Public Works 800 Enterprise Way Tehachapi, CA 93561	Perrin Cowan	661-822-9066	
Union Pacific Railroad	Union Pacific Railroad 1400 Douglas Street Omaha, NE 68179		402-544-5000	

1.5 Schedule

SCE expects to energize the new substation by June 1, 2018. Table 3 shows a preliminary construction schedule for key aspects of the Project: new substation construction and modification, new 66 kV subtransmission line segments, new underground 12 kV distribution getaways, and telecommunications installations. The schedule is based on initial conceptual engineering. The actual construction schedule may vary based upon many factors, including the timeline for additional agency approvals, contracting and materials acquisition, environmental conditions, and any necessary changes to project design due to unexpected physical conditions.

Important: Except for such preconstruction activities as geotechnical evaluations, engineering, design, studies, and permitting, Project-related construction activities will not begin until the CPUC’s Project Manager has issued one or more Notices to Proceed covering the planned activities.

Table 3. Preliminary Construction Schedule																		
	Jan 2017	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan 2018	Feb	Mar	Apr	May	Jun
BANDUCCI SUBSTATION CONSTRUCTION																		
Civil Construction				X	X	X	X	X										
Electrical Construction						X	X	X	X	X								
Testing and Commissioning											X	X	X	X				
Cutovers														X	X	X	X	
66 kV SUBTRANSMISSION LINES				X	X	X	X	X										
12 kV DISTRIBUTION LINES									X	X	X	X	X	X				
EDISON CARRIER SOLUTIONS (ECS Telecom)					X	X	X	X	X	X	X	X	X	X				
TELECOMMUNICATIONS																		
Banducci Substation									X	X	X	X	X	X				
Monolith Substation Modifications									X	X	X	X	X	X				
Cummings Substation Modifications									X	X	X	X	X	X				
Kern River 1 Connections									X	X	X	X	X	X				
IN-SERVICE DATE																	X	X

1.5.1 Construction Work Packages

The Project has been divided into three construction work packages, as listed in Table 4. Anticipated start dates for the work packages are shown. Depending on how it organizes and executes its work, SCE may ultimately use fewer or more work packages.

Table 4. Construction Packages

Work Package	Description	Location	Begin Date
1. Banducci Substation and 66 kV Subtransmission Loop-in	Reestablishment of four staging yards and construction of substation and vaults, and looping in existing Correction-Cummings-Kern River 1 66 kV Subtransmission line	Southeast corner of Pelliser Road and unimproved Dale Road in the community of Cummings Valley	Apr 2017
2. Telecommunications Upgrades	Installation and replacement of overhead and underground fiber optic telecommunications, and modifications at Monolith and Cummings Substations	32 miles of fiber optic cable upgrades from Banducci Substation to Cummings and Monolith Substations.	May 2017
3. 12 kV Distribution Circuits	Construct three new 12 kV distribution circuits in underground duct banks	In franchise of Pelliser Road to Highline Road	Sep 2017

Important: Before work can proceed on a work package, a request for a Notice to Proceed (NTP) must be made by SCE and approved by CPUC (see Section 4.1.1). The mitigation measures and APMs listed in Section 6 include the locations where these requirements apply and identifies what must be implemented prior to the commencement of construction. SCE will work closely with its construction contractor to ensure that site-specific mitigation measures and APMs are clearly identified and implemented. CPUC EMs will verify the implementation of mitigation measures and APMs prior to and during construction.

2. Roles and Responsibilities

2.1 Implementation

SCE is responsible for implementing and maintaining all mitigation measures and APMs, and for obtaining and complying with all required permits and their requirements. The utility is responsible for ensuring that its agents and contractors comply with the MMCRP. SCE also is responsible for satisfying requests from jurisdictional agencies and will notify and copy the CPUC on all correspondences related to final approvals and verifications for the project if not otherwise copied on the correspondence.

Standards for successful mitigation are implicit in some mitigation measures, such as obtaining non-discretionary permits or avoiding a specific impact entirely. Additional resource avoidance or impact minimization conditions may be imposed by applicable agencies with jurisdiction through their discretionary permit processes.

Important: SCE will inform the CPUC Project Manager in writing of mitigation measures or APMs that are not or cannot be successfully implemented. While the CPUC recognizes the need for flexibility post-decision in response to changed circumstances, it believes changes should be the exception, and it intends to ensure that any proposed change is subject to rigorous standards. Consequently, some requested changes may qualify for the process set forth in the MMCRP for minor project changes (see 4.3.3) while others may require the submittal of a Petition for Modification (PFM) pursuant to CPUC Rules of Practice & Procedure, Rule 16.4(a).

Figure 2 illustrates the organization and reporting relationships for during project construction. The CPUC, as Lead Agency, is responsible for ensuring that all mitigation measures and APMs are implemented in a timely fashion as specified, and that the CPUC EM verifies SCE's compliance with mitigation measures, APMs, and conditions of permits issued by other agencies. Other jurisdictional agency representatives may visit construction areas at any reasonable and safe time, and may require information regarding the status of compliance with particular mitigation measures or permits. Additional information on communication protocols is presented in Section 3.

2.2 SCE Roles and Responsibilities

SCE, as the Project proponent, has primary responsibility to:

- Comply with Banducci Substation Project IS/MND requirements for mitigation monitoring, compliance, and reporting before and during construction and for post construction restoration and compensation.
- Prepare required mitigation plans and acquire applicable permits.
- Comply with requirements, conditions, and stipulations set forth in federal, state, and local easements, grants, and permits.
- Incorporate mitigation requirements, as applicable, into the Project design and contract specifications.
- Oversee contractor compliance with plans and contract specifications, including mitigation measures.

During Project construction, SCE will implement a communication protocol among its Environmental Project Manager, Field Leads, Field Monitors, the SCE Project Manager, and the Construction Contractor to implement and track mitigation responsibilities. This protocol will include issue identification, issue resolution, agency coordination, and other communication requirements.

SCE will implement and track mitigation requirements through environmental monitoring, project management, and the SCE construction contractor. The roles and responsibilities of the personnel categories are generally described below and are subject to further refinement and organization. Figure 2 provides a flowchart of the basic functional activities among environmental monitoring staff, project management, and the construction contractor.

2.2.1 Environmental Monitoring

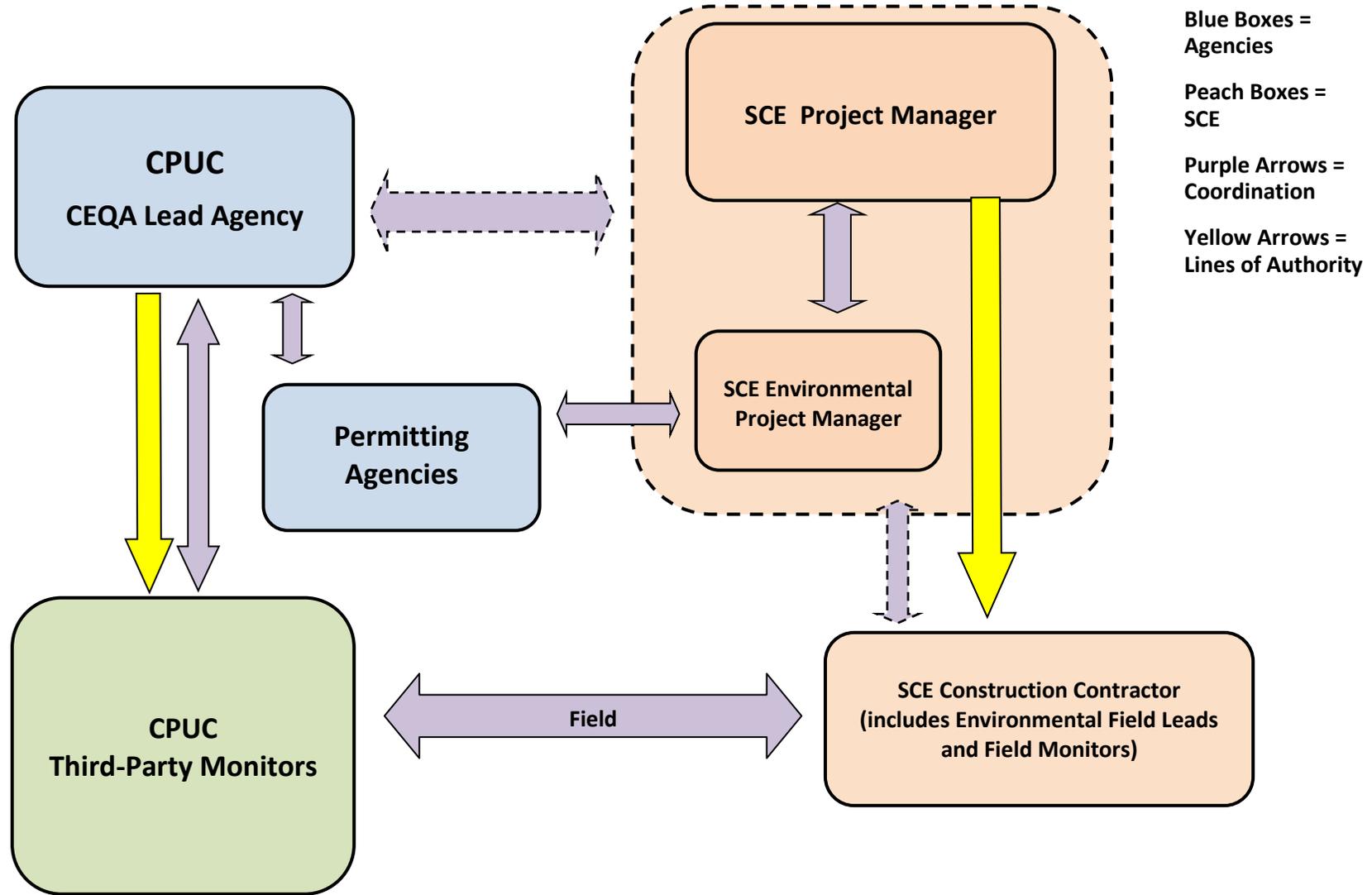
The primary purpose of environmental monitoring is to ensure implementation of required mitigation measures during and after construction. Mitigation activities required during preconstruction will be completed by the time construction begins, including converting mitigation measures to contract specifications, detailed design plans, and other applicable plans.

Because of the sensitivity of biological resources and archaeological resources, monitoring of mitigation implementation for each of these resources will be managed with an individual focus, as described below. Other environmental resource areas will be managed as a group.

Environmental monitoring by SCE and its contractor during construction may involve the following categories of resources:

- SCE Environmental Project Manager (EPM)
- Field leads
- Field monitors

Figure 2. MMCRP Organization – Lines of Communication



Close coordination with the CPUC EMs will occur at applicable levels in accordance with the communication protocol discussed in Section 3.1.

SCE Environmental Project Manager (EPM)

SCE's EPM will provide the appropriate level of oversight for successful implementation of the MMCRP. The EPM's responsibilities include, but are not limited to the following:

- Direct the development and implementation of preconstruction environmental mitigation, planning, permitting, and compliance activities; oversee the environmental inspection program; and oversee environmental training.
- Ensure compliance with and monitor compliance of mitigation and other environmental requirements during construction.
- Monitor and report post-construction restoration and compensation requirements.

Field Leads (FLs)

FLs provided by the construction contractor will oversee the day-to-day environmental monitoring activities during construction. FLs will anticipate the need for field monitors based on Look-Aheads provided by the construction contractor and schedule monitoring resources to support construction. In addition, FLs will provide day-to-day direction to the field.

Because biological and cultural resources are key resource areas that require protection, each work package may have a designated FL for biological and cultural resource mitigation. Other FLs may be assigned as applicable. FLs will oversee field monitors across multiple concurrent construction work crews.

Roles and responsibilities for FLs include:

- Coordinate with the EPM
- Coordinate with the construction contractor
- Schedule field monitors to support anticipated construction
- Provide day-to-day direction, oversight, and mentoring of field monitors
- Clarify mitigation requirements and CPUC or agency/permit conditions to field monitors
- Review and provide QA/QC of daily monitoring reports
- Prepare weekly summary reports to the EPM and the Project Manager
- Coordinate with the CPUC and regulatory agency personnel in the field
- Provide immediate notification of non-compliance or place 1-hour holds on construction
- Convey work stoppage information such as delay times
- Participate in tailboard meetings to focus construction contractor and monitors on issues or resources

Field Monitors (FMs)

FMs provided by the construction contractor will monitor construction activities and implement mitigation requirements. Some FMs will be experts in a particular resource area, such as biological resources or cultural resources. Other FMs will be generalists responsible for monitoring compliance with mitigation requirements other than those related to biological or cultural resources.

For biological and cultural resources, FMs will conduct surveys (i.e., biological or cultural preconstruction clearance surveys), relocate biological resources, verify staking, flag or mark sensitive resources in the field, and monitor construction to ensure applicable Project requirements are met, as directed by FLs.

FMs will prepare appropriate reports (i.e., daily monitoring forms including photos, survey reports) in accordance to SCE compliance reporting and documentation guidelines.

FMs will have the authority to place a 1-hour hold on work activity if a violation is taking place or is imminent, to investigate potential discoveries, or to provide mitigation measure guidance. Once a construction hold has begun, the FM will communicate with the FL, EPM, and the Project Manager. The Project Manager, in consultation with the FL and EPM, will communicate to the construction contractor additional estimated time delays (if any) and the avoidance measures (i.e., flagged Environmentally Sensitive Area or construction site restriction). The FL will also communicate the expected time delay, avoidance measure, or resolution to the FMs.

In summary, roles and responsibilities for FMs include:

- Perform day-to-day in-field resource monitoring at each construction site
- Participate in daily tailboards
- Conduct preconstruction surveys of the construction site and areas around equipment
- Verify staking, flagging, or marking sensitive resources in the field
- Relocate biological resources
- Place 1-hour holds on construction, as needed
- Provide mitigation guidance as needed
- Document non-compliance issues
- Coordinate with the FL, EPM, and Project Manager, as needed
- Prepare daily monitoring reports

The SCE monitoring team will also ensure that post-construction restoration requirements, as required by mitigation measures, are implemented and monitored.

2.2.2 SCE Project Manager

The SCE Project Manager provides overall direction, management, leadership, and corporate coordination for the project. The SCE Project Manager will oversee, manage, and coordinate with the construction contractor to ensure overall project construction is completed as required in the plans and contract, within the required schedule. The SCE Project Manager will ensure that mitigation requirements, as included in the design plans and specifications, are implemented and that coordination occurs regarding work stoppages. The SCE Project Manager's responsibilities include:

- Coordinating construction, engineering, and SCE environmental personnel
- Integrating environmental responsibilities into all levels of the project organization
- Ensuring compliance with project mitigation measures, APMs, permit conditions, and the MMCRP
- Communicating project activities, schedules, and public relation issues to the project team
- Managing the construction contractor.

2.2.3 SCE Construction Contractor

SCE may elect to use subcontracted construction crews on the project. The construction contractor will be responsible for constructing the Project elements in each work package, including mitigation requirements, as included in the design plans and contract specifications. Under the direction of SCE, subcontracted construction crews are responsible for complying with mitigation measures and APM requirements, permit conditions, and the MMCRP.

The construction contractor will provide daily construction schedules and Look-Aheads to the SCE Project Manager and LMs. The construction contractor will describe the types of activities planned so that the

adequate monitoring resources can be provided. The construction contractor will delineate any disturbance areas prior to mobilization to a work area. The SCE Project Manager or designee will verify disturbance areas are properly staked. The construction contractor will receive Authorization to Proceed (ATP) from the SCE Project Manager prior to scheduling construction activities.

Daily tailboards will provide essential communication to the Project team onsite. The tailboard will involve the construction contractor's submittal of daily activities and multiday Look-Aheads to the FLs and FMs. Sensitive resources or environmental issues will be evaluated and discussed for the particular work site. Contingencies for brief delays (weather related) and longer delays (site condition related) will be evaluated in the event that an alternative course of action is needed. Tailboard discussion topics will include activities related to staying on schedule, relevant construction and mitigation topics applicable to the day's activities, and mobilization and demobilization needs for both resources and equipment. Key environmental responsibilities for construction contractor staff include:

- Review and understand the environmental requirements
- Implement environmental protection requirements and conditions during construction and maintain compliance with Project requirements
- Attend the Project's environmental training program before beginning work on the Project
- Respond to SCE FM's requests during construction

2.2.4 Construction Workers

Construction workers who enter the project site are responsible for following all mitigation measures and APM requirements, permit conditions, and the MMCRP. Construction workers are responsible for attending required environmental training(s) applicable to their position, and directing any questions to the SCE Project Manager or designee.

2.3 California Public Utilities Commission Roles and Responsibilities

2.3.1 CPUC Project Manager

The CPUC PM has overall responsibility for ensuring that mitigation measures and APMs are implemented as adopted by the CPUC. The CPUC PM will determine the effectiveness of the MMCRP based on the implementation of the measures included in the mitigation monitoring table in Section 6. The CPUC delegates field monitoring and reporting responsibilities to its third-party EMs during construction and will oversee their work through telephone calls and review of daily and weekly status reports. The CPUC PM will be notified of all noncompliance situations and may suggest measures to help resolve issue(s).

Important: The CPUC PM will issue NTPs for construction of each work package identified by SCE. However, the CPUC's NTP does not authorize construction to start if additional approvals are required and pending from other agencies and such approvals have not been obtained at the time of issuance of an NTP.

2.3.2 CPUC Environmental Monitor (Aspen)

SCE has primary responsibility for ensuring that construction activities are conducted in accordance with approved Project mitigation measures, APMs, compliance plans, and permit conditions.

The overall monitoring program will be administered under the direction and oversight of the CPUC PM. The CPUC will delegate daily monitoring and reporting responsibilities to a third-party monitor (Aspen).

The role of the CPUC third party monitor (Aspen) is to ensure that compliance is being achieved and to document compliance using verbal and written communications. The number of third-party monitors (CPUC EMs) and the frequency of site inspections will depend on the number of concurrent construction activities and their locations with respect to sensitive resources and land uses.

- **Aspen Monitoring Manager.** The Monitoring Manager supervises Aspen’s CPUC EMs, determines the appropriate inspection frequency, and is responsible for weekly report preparation. The Monitoring Manager also serves as the main point of contact with the CPUC PM for major compliance matters.
- **Aspen/CPUC Environmental Monitors (CPUC EMs).** CPUC EMs will conduct the day-to-day monitoring and be the primary point of contact with in-field agency and project personnel. CPUC EMs will be an integral part of the project team and will stay apprised of construction activities and schedule changes, and will monitor construction activities for compliance with project mitigation measures, APMs, compliance plans, and permit conditions. The CPUC EMs will document compliance through daily logs and provide input for the weekly reports. The CPUC EMs shall note any issues or problems with implementation of mitigation/APM/permit conditions, notify the appropriate designated project members, and report problems to the CPUC PM. All other issues will be brought to the attention of the SCE field representative to address appropriately.

Important: The enforcement authority of the CPUC EM in the field is limited to conditions posing imminent safety or resource endangerment concerns at a work location. The CPUC EM is authorized to temporarily stop work under these conditions if it is safe to do so. SCE will address the identified issues. Only the CPUC PM has authority to shut down the project completely.

3. Communication

Good communication is essential to successful implementation of an environmental mitigation compliance program. To avoid Project delays, CPUC and SCE environmental and construction representatives will interact regularly and maintain professional, responsive communications at all times. SCE representatives will coordinate closely with CPUC EMs throughout the monitoring effort to ensure that issues are addressed and resolved in a timely manner. To that end, this section provides a communication protocol for the timely and accurate dissemination of information to all levels of the Project regarding surveys, plans, mitigation measures, construction activities, and planned or upcoming work.

3.1 Communication Protocol

To ensure that the CPUC EMs can get accurate information on ongoing surveys, construction work, and schedules, the following protocols have been established:

- The CPUC EMs’ primary point of contact will be the SCE FL. If not available, the SCE EPM will be the point of contact. If issues arise and cannot be resolved at this level, the issue will be elevated to the CPUC EM Project Manager/EPM via e-mail or telephone.
- The FL or EPM will inform CPUC EMs of all current and planned survey and construction activities, including status of permits and activity locations, in a timely manner. Timely notification must be sufficient to allow response time for CPUC EMs to be present for that activity.
- The CPUC EM and other designated agency representatives or staff may talk to anyone on the construction site to ask questions about their activity, but the construction personnel may opt to refer the CPUC EM to the FL or other designated person. The FLs are the appropriate contacts for obtaining information on construction activity schedules or construction practices.

- SCE will provide to the CPUC EM a list of all construction monitoring personnel and managers, identified by work package or component, title, and contact information. An updated list will be distributed as needed to keep all parties informed of monitor and staff additions/changes, as well as construction scheduling changes. This list of personnel, subsequent updates, and construction schedule changes will be distributed to all persons on the list throughout the construction process.
- The CPUC EM will continue to report compliance concerns first to the FLs and give them time to resolve compliance issues. If this includes discussions with resource agencies, documentation of such communication and any subsequent actions to be undertaken to achieve compliance will be provided to the CPUC EM. If the concern involves a permit, because SCE is the permit holder with jurisdictional agencies, the EPM will consult with the applicable resource agencies. If the CPUC EM has an ongoing unresolved concern about a mitigation measure that could affect a permit condition or could result in resource endangerment, the EPM will call the appropriate resource agency to discuss the issue. The EPM will take the lead in the coordination effort and in resolving the issue.
- The resource agencies will be notified immediately (within 24 hours or within timeframes designated by permits) by the EPM of any substantive issues regarding resources under their jurisdiction and of any actions taken to resolve the issue, consistent with permit requirements. In addition, the CPUC EM will receive immediate notification of these communications if not already aware of the issue and action.
- Prior to or subsequent to agency notification, the EPM will develop a plan to resolve the issue and will follow up with the respective agencies to explain the strategy and receive agency approval.
- SCE will expeditiously provide verbal notification and/or submit a preliminary electronic notification of a suspected event, followed by a timely submittal of a final notification that more fully characterizes the event, actions, and outcomes.
- If a “take” of a protected biological resource is imminent or if there is a danger/hazard to a special status biological resource, the CPUC EM can request that work be stopped in that area immediately (as long as it can be done safely); this request should be made to the FL or senior SCE person on site. At any time, anyone can order an activity to be halted temporarily if a take or a hazard is imminent.
- Bi-weekly conference calls will include a discussion of construction and compliance activities, with the CPUC EM, EPM, and FLs, and may include any agency staff participation.

3.2 Preconstruction Compliance Coordination

Prior to construction, SCE is required by the terms of some project mitigation measures and APMs and permitting requirements of other agencies, to prepare various plans and obtain approval of these plans, in addition to performing surveys. During the preconstruction period, SCE will conduct meetings, conference calls, and site visits with the CPUC, technical representatives of the CPUC third-party monitor, and other agencies. The purpose of the preconstruction compliance coordination process is to:

- Discuss and document the status of all required SCE’s submittals,
- Document the findings of data reviews and jurisdictional agency approvals,
- Review SCE submittals,
- Document the status of mitigation measures/APMs as they apply to the Project or work packages, and
- Discuss refinements or minor changes to the Project.

The goal of the preconstruction process is to complete all required actions so the CPUC and other agencies, as appropriate, can issue NTP authorizations for each Project work package.

Other preconstruction activities include the following:

- Inclusion of mitigation requirements in contract designs, instructions, and specifications
- Field verification of work locations to confirm any need for siting adjustments based on the presence of sensitive resources
- Field verification of any construction yard sites.
- If required, a preconstruction meeting will be held with the CPUC, SCE, and CPUC EMs to review the MMCRP and mutually agree upon the Project's communication protocol. Based on discussion at the meeting and ongoing input from each party, this MMCRP will be updated.

3.3 Coordination during Construction

Many mitigation measures were derived from specific permit conditions or agency input. In coordination with the CPUC EM, SCE will be responsible for contacting resource agencies and immediately notifying them of issues arising with regard to matters under their jurisdiction. CPUC shall be copied on all correspondence (email or letter) and provided copies of documentation that flow between SCE and resource agencies. If an unresolved issue regarding compliance with a mitigation measure affects a permit requirement under the jurisdiction of a resource agency, the CPUC EM will contact the Environmental Compliance Lead and they will contact the agency to discuss resolution.

3.4 Daily Communication

Generally, problems encountered during construction can be resolved in the field through regular communication among the FL, construction contractors, and CPUC EMs. Field staff will be equipped with cell phones and will be available to receive phone calls at all times during construction. The Project contact list will be provided and updated as needed by SCE.

3.4.1 CPUC EMs

The CPUC EM's primary point of contact in the field is the FL. The CPUC EM will contact the FL if an activity is observed that conflicts with one or more of the mitigation measures, APMs, or permit conditions, so that the situation can be corrected by SCE. If the CPUC EM cannot immediately reach the FL, the EPM will be contacted to address the issue. Similarly, the CPUC EM will contact the FL for information on where construction crews are working, the status of mitigation measures, and for schedule forecasts. The CPUC EM may discuss construction procedures directly with the construction contractors; however, SCE may require its construction contractors to defer questions to an onsite SCE representative. In all cases, the CPUC EM will contact the designated SCE representative if a problem is noted that requires action from the construction contractor or SCE.

Important: The CPUC EM will not direct the construction contractor, but will contact the designated SCE contact person. In the event an activity imposes an imminent threat to a sensitive resource or an undue risk, the CPUC EM will try to contact the FL, who has the authority to stop work; however, if they are not immediately available, the CPUC EM has the authority to stop work at that location if it is safe to do so.

3.4.2 SCE

SCE will provide the CPUC and the CPUC monitoring team with a contact list identifying construction monitoring personnel and construction supervisory staff to contact regarding compliance issues. The contact list will include each person's title and responsibility, including the names of SCE and CPUC EMs, project managers, supervisory staff, and other members of the team. The list shall include phone numbers and e-mail addresses where team members can be reached during construction. The contact list will be

updated and redistributed as necessary by SCE as new personnel are assigned to the Project. This list is confidential and will not be published or put on the CPUC project website.

SCE and/or its contractors will hold daily onsite meetings that the FL will attend. Prior to beginning the day's work at a job site, a tailboard briefing will be held by SCE and/or its contractor. Possible subjects include reemphasizing safety and identifying any specific safety concerns associated with that day's operation, potential environmental issues that workers should be aware of, etc.

3.5 Scheduled Communications

3.5.1 SCE Compliance Report

SCE will prepare and distribute a weekly environmental compliance status report for distribution to key team members, including the CPUC. The CPUC EM will review the weekly report to ensure that the status of mitigation measures, APMs, and permit conditions is consistent with observations in the field. Questions regarding the status of mitigation measures will be directed to EPM. The weekly environmental compliance status report also will be a tool to keep all parties informed of construction progress and schedule changes.

3.5.2 Scheduled Progress Meetings

SCE will conduct weekly field meetings with construction managers, supervisors, SCE's environmental representatives, and other appropriate staff to discuss work completed, work anticipated for the following period, and the status of mitigation measures. The weekly field meetings also will provide a forum for discussing environmental compliance issues or concerns.

SCE may request that CPUC EMs (and other agency EMs) participate in the field meetings to help resolve any issues that may have arisen during the previous period and to anticipate potential issues that may arise during upcoming activities. Alternatively, the EPM or the CPUC's EMs may recommend a separate meeting to discuss mitigation, project change requests, or other Project-related issues. These meetings may be held at a designated office location or on the Project site.

3.5.3 Scheduled Conference Call

The EPM, CPUC PM, the CPUC Monitoring Team, and other parties may participate in a bi-weekly teleconference call. The teleconference calls will be scheduled for an agreed date and time and will be used to identify actual or potential issues and discuss solutions. The conference calls will focus on the Mitigation Monitoring Program and project progress generally.

3.6 As-needed Interagency Conference Calls

From time to time during the preconstruction process or during construction, the CPUC, resource agencies, and/or SCE may determine that conference calls may be necessary or appropriate to discuss the status of specific mitigation compliance as they relate to permit requirements. These calls will be scheduled in advance, to the extent feasible, by e-mail, and will include the EPM. An agenda will be provided before the call.

4. Environmental Compliance and Field Procedures

4.1 Preconstruction Compliance Verification

Prior to beginning construction, SCE is required by the terms of the mitigation measures, APMs, and various permits and approvals for other regulatory agencies, to prepare and obtain approval of various plans and to perform various surveys and studies. Copies of plans, surveys, and studies will be retained by Aspen and provided to the CPUC with all files at the completion of the Project. The plans, surveys, studies, and other documentation required to be completed by SCE before construction are identified in Section 6.

While these documents are being reviewed by the approving agencies, they also are reviewed by the CPUC and its representatives. Resource agencies also may be involved in the review of applicable plans and reports.

The CPUC EMs, including project management staff and technical experts as needed, will review and provide comments on all mitigation plans and reports. As appropriate, resource agencies also may be involved in the review of applicable plans and reports, and may provide comments. Comments on submitted plans and reports will be provided to SCE to ensure that they adequately accomplish the intended reduction in impacts. For required local and State agency permitting/consultations, the CPUC EM will track SCE's progress as it relates to SCE's construction plans and project mitigation, APMs, and permitting requirements. Based on SCE's construction plans, CPUC may authorize construction to begin on a phased basis, and the CPUC EM will handle preconstruction compliance review accordingly. CPUC may issue NTPs for construction of each phase separately, as soon as preconstruction compliance is satisfactorily accomplished for that phase.

Important: Compliance with all preconstruction mitigation measures and APMs will be verified prior to construction, and construction may not start on any work package before SCE receives a written NTP from the CPUC PM and other necessary approvals, if any. In general, the CPUC will not issue an NTP until all preconstruction requirements have been fulfilled for a given phase. To save time, SCE should identify all required workspace needs for each phase of construction prior to the start of active construction, so that the locations and their use can be included in the NTP.

4.1.1 Notice to Proceed Procedures

CPUC must issue a Notice to Proceed (NTP) before construction can start.

SCE will submit a formal request for an NTP. If needed, minor project change requests may be submitted by SCE with the NTP request for incorporation into the NTP (see Section 4.3.3 for minor project change submittal requirements). Where there may be multiple spreads or work sites, SCE may elect to request separate NTPs. Each separate NTP request will be applicable to a defined segment or aspect of the Project.

CPUC will review the NTP request and the applicable preconstruction requirements to ensure that all information required to process and approve the NTP is included. CPUC may request additional information or clarification as needed. Based on information provided in the request for an NTP and its review, CPUC will issue the NTP.

In general, an NTP request must include the following:

- A description of the work
- Detailed description of the location, including maps, photos, and/or other supporting documents

- Verification that all mitigation measures, permit conditions or requirements, APMs, project parameters, or other project stipulations that apply to the work covered by the NTP request have been met.
- In a case where some outstanding requirements cannot be met prior to issuance of the NTP, an outline of outstanding submittals and how they will be met prior to construction
- Up-to-date resource surveys or a commitment to conduct surveys and submit survey results prior to construction
- Cultural resource surveys or verification that no cultural resources will be significantly impacted
- Copies of permits issued by other agencies, including any requirements
- Date when construction is anticipated to begin and estimated duration of work

Section 6 lists the mitigation measures and APMs, the timing for implementation, and whether CPUC review or approval is required before construction can begin. For reference, each NTP issued by CPUC will reiterate CPUC and other agency conditions or requirements that must be satisfied either before work begins or during construction. The NTP will state whether preconstruction requirements in mitigation measures, APMs, and permits have been met, including the completion of any applicable surveys and studies to be undertaken. If compliance with some requirements cannot be met prior to NTP issuance, the reasons will be identified by SCE and noted in the NTP. At its discretion, CPUC may issue the NTP subject to specific conditions. In such an event, the NTP will clearly define any limitations that apply and the actions to be taken and documented by SCE prior to construction.

4.1.2 Compliance Reporting

The CPUC EM will perform compliance inspections throughout construction to ensure compliance with all applicable mitigation measures, APMs, plans, permits, and conditions of approval from CPUC and other agencies. The CPUC EM will document observations in the project area through field notes and digital photography. The photographs will be incorporated in weekly reports and related to a discussion of specific construction or compliance activity. In addition, daily field logs documenting compliance of specific crews, construction activities, or resource protection measures will be maintained. Field logs will be used to prepare weekly reports and to track and update the status of mitigation measures listed in Section 6.

Site visits by CPUC may be coordinated with SCE or be unannounced. Supplemental information provided by SCE, including preconstruction submittals, survey reports, weekly reports, meeting notes, agency correspondence, and SCE's Field Reporting Environmental Database (FRED) will be used to verify compliance.

Compliance documents and reports will be posted on the CPUC public website, accessible at:

<http://www.cpuc.ca.gov/Environment/info/aspen/banduccisubstation/banduccisubstation.htm>

4.1.3 Compliance and Non-Compliance Levels

Project compliance and non-compliance levels that will be used and the specific actions by the CPUC monitoring team are as follows:

- **Level A Compliance.** All mitigation measures and permit conditions are being complied with and there are no violations. No corrective action is necessary.
- **Level B Non-Compliance.** One aspect of a mitigation measure is not in compliance, resulting in only partial implementation of a measure or permit condition, but there has been no significant impact as a result.

Action: A verbal notice shall be given to the Environmental Compliance Lead (or assigned designee) and corrective action shall be required of SCE within 1 day or other maximum period, as determined by the CPUC EM.

Follow up: If corrective action is not taken within the stated period, a Project Memorandum (written warning) will be issued. If a Level B Non-Compliance is allowed to continue, the non-compliant activity could result in a significant impact over time. Therefore, the frequency of Level B Non-Compliances will be tracked by the CPUC EM.

If corrective action is not taken or does not address Level B Non-Compliance trends, a Non-Compliance Report (NCR) will be issued. The NCR will state that failure to resolve the identified condition or situation may lead to a project stop work order and/or action under the CPUC's CEQA Citation Program.

- **Level C Non-Compliance.** One or more of the aspects of a mitigation measure or permit condition are not in compliance, and the implementation of a mitigation measure is deficient or non-existent, resulting in potentially significant impact(s) or an immediate threat of major, irreversible environmental damage or property loss.

Action: A verbal notice shall be given to the Environmental Compliance Lead (or assigned designee), followed immediately by an NCR sent to SCE's Environmental Compliance Lead (or assigned designee). Corrective action shall begin immediately.

Follow up: If corrective action is not taken immediately or the corrective action is insufficient, the CPUC EM shall notify the CPUC PM, Aspen Monitoring Manager, and Aspen Liaison, who will review courses of action available.

- **Level D Stop Work Order.** The CPUC has the authority to shut down project construction. Stop Work Orders halt construction and are issued when a compliance violation continues over an extended period of time, is repeated several times, or when a violation could cause harm to a protected resource.

Action: Based on the severity of a given infraction or pattern of non-compliant activity, the CPUC Energy Division Director may direct that all or some portion of the work be stopped. This order will be conveyed directly from the Director or through the CPUC PM.

Follow up: If a shutdown of construction or an activity is ordered, the construction or activity shall not resume until authorized by the Energy Division Director or CPUC PM in writing.

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

A non-compliant event regarding environmental resources may involve other agencies, in which case that CPUC EM will:

- Confirm that SCE has informed the applicable resource agency when non-compliant actions have the potential to harm a protected environmental resource or species (outside the reporting process associated with incidental takes as permitted by the resource agency).
- If timely notification is not made by SCE, the CPUC EM will contact the applicable resource agency.

If permit or resources issues are involved, the CPUC and/or resource agencies may order work stoppages and the development of strategies for successful resource/species protection, consistent with the applicable permit or mitigation measure.

Important: The CPUC EM does not have the authority to shut down or restart construction, nor shall the CPUC EM direct the work of a construction contractor or subcontractor. However, if an imminent threat to safety or an unpermitted risk to a sensitive resource is observed, the CPUC EM has the responsibility to advise the SCE or contractor site manager to immediately cease the threatening activity until the situation is rectified. If no response, the CPUC EM is authorized to temporarily stop work at the given location under these conditions if it is safe to do so. The CPUC EM shall immediately notify the CPUC PM and Aspen Monitoring Manager and report the status. If no action is taken by SCE in response to the situation, CPUC will determine next steps.

4.1.4 Compliance Reporting and Documentation

All non-compliant activity will be recorded and reported. Based on the severity of the non-compliant event, notice to CPUC will be immediate or in the weekly report.

The CPUC EM will determine whether the observed construction activities are consistent with mitigation measures, APMs, and project parameters as identified in the Final MND and adopted by the CPUC, as well as any applicable permit conditions. All observations and communications will be noted in a logbook. Deviations from mitigation measures, APMs, or permit conditions will be considered non-compliant events and will be documented.

4.1.5 SCE Reportable Events

Unanticipated events may occur that impact project personnel, public safety, or protected resources and may not be observed by the CPUC EM. While these events may not result in a deviation from or violation of a mitigation measure or permit condition, it is important that these events be reported to the appropriate agencies and the CPUC so they are in a position to respond to questions or concerns from the public or managers. Accordingly, SCE will immediately report these events to the CPUC and other regulatory agencies as appropriate. SCE will submit to the appropriate agency, if any, and to CPUC a final verbal or electronic notification characterizing the event, actions taken, and outcomes.

Examples of reportable events are:

- any event a mitigation measure failed to address
- a violation of a permit condition
- an occurrence that posed or could have posed a risk to public health and safety
- any event requiring emergency response
- a "near miss" event involving construction equipment and, in SCE's reasonable judgment, had the potential to result in serious bodily harm or death.

4.2 Dispute Resolution

The MMCRP is intended to reduce or eliminate potential disputes. However, even with the best preparation, differences in mitigation implementation approaches and interpretation may occur. Issues should first be addressed informally at the field level, between the CPUC EM and SCE's FLs, FMs, or at the regular progress meetings. Questions may be raised to the SCE EPM and the SCE Project Manager for resolution. Should the issue persist or not be resolved at these levels, the following procedures will be used.

- Step 1.** Differences in mitigation implementation approaches, disputes, and complaints (including those of the public) are directed to the CPUC designated PM for resolution. The PM will attempt to resolve the dispute with SCE's Environmental Project Manager.
- Step 2.** If Step 1 fails to resolve the issue, the CPUC PM may initiate enforcement or compliance action to address deviations from the Project or the adopted MMCRP, if they have occurred without prior authorization. The CPUC Project Manager may issue a formal letter requiring corrective actions to address the unresolved or persistent deviations from the Project or adopted MMCRP.
- Step 3.** If the differences, dispute, or complaint cannot be resolved informally or through enforcement or compliance action by the CPUC, the affected participant in the dispute or complaint may file a written "notice of dispute" with the CPUC's Executive Director. This notice should be filed in order to resolve the dispute in a timely manner, with copies concurrently served on other affected participants. Within 10 days of receipt, the Executive Director or designee(s) will meet or confer with the filer and other affected participants to resolve the dispute. The Executive Director will issue an Executive Resolution describing the decision, and serve the filer and other affected participants.
- Step 4.** If one or more of the affected parties is not satisfied with the decision as described in the resolution, such party(ies) may appeal it to the Commission via a procedure to be specified by the Commission.

Involved parties may also seek review by the Commission through procedures specified in the Commission'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.

The dispute resolution process could occur concurrently with the communication protocol during construction for non-compliant events.

Separate enforcement steps by the regulatory agencies may follow different steps or procedures. The CPUC PM and the SCE EPM will coordinate with other permitting agencies for issues outside CPUC's jurisdiction. Separate dispute resolution or enforcement steps solely involving other regulatory agencies would follow that agency's procedures.

4.3 Project Refinements

4.3.1 Transition from Preliminary Design to Final Engineering

The MND for the Project was based on preliminary designs. SCE has been in the process of completing final project design and engineering. Some project component locations may have been refined as engineering progresses in order to comply with mitigation measures, avoid or minimize environmental impacts, and reduce or eliminate feasibility constraints.

Mitigation measure requirements were finalized at the time of project approval, and preconstruction compliance submittals will be reviewed based on the requirements in these measures. The process outlined below allows for changes in the case of unforeseen circumstances, as long as the intent of the mitigation measure is satisfied (i.e., the impact is mitigated as intended, consistent with residual impact determinations in the MND).

4.3.2 Project Changes

At various times throughout project construction (following approval of final design plans), changes to the Project requirements may be needed to facilitate construction or provide more effective protection of

resources. When changes are necessary for specific field situations, SCE and CPUC, in consultation with the applicable resource agencies, will work together to find solutions that avoid conflicts with adopted mitigation measures.

4.3.3 Minor Project Changes

The CPUC PM, along with the CPUC Monitoring Team, will ensure that any process to consider minor project changes that may be necessary due to final engineering or variances or deviations from the procedures identified under the monitoring program is consistent with CEQA requirements.

- No project changes will be approved by the CPUC PM if they
 - would be located outside of the geographic boundary of the project study area,
 - create new or substantially more severe significant impacts, or
 - conflict with any mitigation measure or applicable law or policy.
- Minor project changes are strictly limited to changes that
 - will not trigger other permit requirements unless the appropriate agency has approved the change, and
 - clearly and strictly comply with the intent of the mitigation measure or applicable law or policy.

This determination is ministerial, and shall be made by the CPUC Project Manager. For other project changes SCE may need to submit a Petition for Modification (PFM). Should a project change require a PFM, supplemental environmental review under CEQA would be required.

Requests for staff approval of a minor project change must be made in writing and should include the following:

- A detailed description of the proposed minor changes, including an explanation of why the refinements are necessary, and a reference to the approved documents.
- Photos, maps, and other supporting documentation illustrating the difference between: the existing conditions in the area, the approved project, and the proposed minor changes.
- The potential impacts of the proposed minor changes, including a discussion of each environmental issue area that could be affected by the minor changes with accompanying verification that there will be no substantial increase in the severity of any previously identified significant impacts to resources affected by the project and no new significant impacts, after application of previously adopted mitigation.
- Whether the minor changes conflict with any applicant proposed measures or mitigation measures.
- Whether the minor changes conflict with any applicable guideline, ordinance, code, rule, regulation, order, decision, statute or policy.
- Water/wetland/storm water related resource information if the minor changes would result in any additional land disturbance, road distance or width, changes to jurisdictional delineation of waters, or changes to water protection best management practices.
- Date of expected construction at the minor changes site area.

The CPUC PM may request additional information or a site visit in order to process the request. Examples of changes that may be approved by staff after final engineering include, but are not limited to:

- Adjusting the alignment or position of a project element to avoid unanticipated impacts related to cultural artifacts, buried utility infrastructure, hazardous and toxic substances, and other land use impacts including effects on homeowners.
- Adjusting the alignment or position of a project element to avoid or adapt to conditions on the ground that vary from the conditions that existed at the time of the original environmental analysis.

Important: The changes must be located within the geographic study area used in the original environmental analysis and must not create a new significant impact or a substantial increase in the severity of a previously identified significant impact.

To initiate a project minor changes request, SCE will complete a Project Minor Change Request Form (see Attachment B), prepare the appropriate supporting documentation, and obtain the required signatures. SCE will submit the completed Project Minor Change Request Form and supporting documentation by email (scanned copy) to the CPUC Project Manager with a copy to Aspen.

The CPUC Monitoring Team will review the request to ensure that all of the information required to process the minor project change is included, and then forward the request to the CPUC Project Manager for review and approval. The CPUC Project Manager may request a site visit from the CPUC EM, or may request additional information to process the request. In some cases, project minor changes may require approval by jurisdictional agencies as well.

All approved minor change requests will be tracked in the weekly reports.

4.3.4 Temporary Extra Work Space Procedures

For the purposes of this MMCRP, Temporary Extra Work Space (TEWS) is defined as an existing workspace (i.e., no site preparation is required) that was not specifically identified and evaluated during the CEQA process but would be used by SCE during construction for a period of up to 60 days. Any such location required to be utilized for a period longer than 60 days will require a minor project change approval (see Section 4.3.3).

In the event that 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. If appropriate, SCE will also send a copy of the TEWS to affected jurisdictional agencies.

SCE must demonstrate that:

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

Following is a list of the specific information that SCE would be required to submit with its TEWS request:

- 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 old oil spills or other potentially hazardous or polluting substances; abandoned vehicles, equipment, or other materials; or other sensitive resources
- Biological and botanical surveys, if appropriate

- Cultural resource survey
- Duration and dates of expected use of the TEWS
- Details of the expected condition of the site after use

A sample TEWS form is included as Attachment C.

5. Records Management

Weekly status reports will be filed and used by the CPUC third-party EM to prepare a final environmental compliance report following the completion of construction. The final report will provide an overview of construction and a discussion of environmental compliance and lessons learned.

5.1 Public Access to Records

A publicly accessible website for the Project is maintained by the CPUC to make available current versions of reports and other documents prepared for mitigation compliance.

The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports will be made available by the CPUC for public inspection on request, consistent with critical infrastructure requirements, requirements to protect cultural resources, and General Order (G.O.) 66-C. In order to facilitate the public's awareness, the CPUC will post this MMCRP document, weekly reports, and other pertinent Project documents on the CPUC public website. Other monitoring compliance reports, copies of permits, and documents will be available in their final form on the Project website once they are approved by the CPUC or other permitting agencies. Access to Critical Energy Infrastructure Information (CEII) documentation, the location of protected cultural resources, and other information meeting the standards for non-disclosure set forth in G.O. 66-C will not be available on the public website.

The CPUC public website is accessible at:

<http://www.cpuc.ca.gov/Environment/info/aspen/banduccisubstation/banduccisubstation.htm>

6. Mitigation Measures and APMs

The following tables include the mitigation measures and APMs from the adopted MND. The tables indicate the resource of concern, the measure to be implemented, the monitoring requirement, and when the measure is to be implemented (i.e., pre-, during, or post-construction).

6.1 Mitigation Monitoring Plan – Preconstruction Measures

Table 5A. Mitigation Monitoring Plan – Preconstruction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
AGRICULTURAL RESOURCES			
Conversion of Important Farmland	<p>MM AG-1: Minimize Impacts to Agricultural Resources. For project components sited on or adjacent to Important Farmland, SCE shall:</p> <ul style="list-style-type: none"> ▪ Notify adjacent agricultural operations of construction schedules at least 30 days in advance of the start of construction-related activities. The announcement shall: (1) describe where and when construction is planned; and (2) provide contact information for a point of contact for complaints about impacts to adjacent agricultural resources related to construction activities. <p>Prior to commencing ground disturbing activities, the Applicant shall submit a copy of the template used for the notification letter and a list of the landowners notified to the CPUC. The Applicant shall document all complaints and strategies for resolving complaints in regular reporting to the CPUC.</p>	Review notices, list of landowners, and complaints report(s) to minimize impacts to Important Farmland	
Conversion of Important Farmland	<p>MM AG-2: Compensate for Loss of Prime Farmland. If Prime Farmland (as designated by the California Department of Conservation’s Farmland Mapping and Monitoring Program) is converted to non-agricultural use, SCE shall mitigate for the loss of farmland through permanent preservation of off-site farmlands of equal or greater quality at a 1:1 ratio. Prior to the start of ground disturbance, SCE shall provide evidence to the CPUC that an Agricultural Conservation Easement has been granted in perpetuity to the local jurisdiction or an Agricultural Land Trust.</p> <p>The Agricultural Land Trust must either: (A) demonstrate that it: (1) has adopted the Land Trust Alliance’s Standards and Practices; (2) has substantial experience creating and stewarding Agricultural Conservation Easements; and (3) has a stewardship endowment to help pay for its perpetual stewardship obligations; or (B) be approved by the CPUC.</p> <p>Prior to the commencement of ground disturbing activities, the applicant shall also provide appropriate funds (as determined by the CPUC) to compensate for reasonable administrative costs incurred by the easement holder, including an endowment to cover the cost of monitoring and enforcing the easement in perpetuity.</p>	Review proof of compensation for loss of Prime Farmland	

Table 5A. Mitigation Monitoring Plan – Preconstruction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
AIR QUALITY			
BIOLOGICAL RESOURCES			
Special-Status Plants [MM B-1 supersedes APM Bio-1 and APM Bio-5]	<p>MM B-1: Perform Biological Resource Surveys and Construction Monitoring. After project approval, but within 30 days prior to the start of construction, updated biological resource surveys shall be conducted confirming special-status or listed biological resources, if any, in the vicinity of the Proposed Project, including the 66 kV subtransmission line route, telecommunication line route, wire stringing locations, access roads, and staging yards. Updated survey results, including a map of biological resources identified, shall be provided to the CPUC for review and verification prior to construction. Prior to submitting the first survey report, SCE shall consult with the CPUC regarding the preferred format.</p>	Review survey results and reports to identify and minimize impacts to sensitive biological resources	
Special-Status Plants	<p>MM B-2: Establish Special-status Plants Buffers. If special-status plants are found during field surveys, a buffer shall be established around the plants or plant populations within which no construction work is permitted unless the CPUC determines that such work may proceed without significantly impacting the special-status and listed species. The size of the buffer shall be adequate to ensure that plants are not significantly disturbed and shall be determined by a qualified biologist. Construction monitors shall ensure that work crews are aware of the buffer and related work restrictions.</p> <p>If special-status plants cannot be avoided, SCE shall coordinate with the CPUC, CDFW, and USFWS to determine whether construction and operation impacts of the Proposed Project would be significant. Impacts to special-status plants will be considered significant if listed threatened or endangered species would be directly or indirectly affected; or plants presumed extinct in California (California Rare Plant Rank [CRPR] 1A) would be directly or indirectly affected; or ten (10) percent or more of a local occurrence of CRPR 1B or CRPR 2 species would be directly or indirectly affected.</p> <p>In the event any of the above are triggered, SCE shall coordinate with the CPUC, CDFW, and USFWS to design and implement appropriate mitigation measures. These measures may include, but would not be limited to:</p> <ul style="list-style-type: none"> ▪ Avoidance. Project construction would be adjusted as necessary to avoid or minimize impacts to special-status plants and provide a minimum 25 foot buffer area surrounding each avoided occurrence, where no project activities will take place. ▪ Off-site Compensation. SCE would provide compensation lands to protect off-site special-status plant occurrence(s). Compensation lands would protect acreage, habitat suitability, and overall numbers of each special-status plant at no less than a 1:1 ratio or levels comparable to the project's impacts. In addition, the applicant will provide funding for long-term conservation management of the compensation land. The applicant will prepare a Compensation Plan, identifying the proposed compensation lands, proposed habitat improvements and long-term management, and specific legal mechanism for long-term preservation (e.g., holder of 	Review buffer areas, proof of compensation, Salvage and Relocation Plan and propagation/relocation strategy, if needed	

Table 5A. Mitigation Monitoring Plan – Preconstruction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
	<p>conservation easement or fee title). The Conservation Plan will be subject to review and approval by the CPUC in consultation with the CDFW and, upon approval, will be implemented in full. In cases where a federally or state-listed threatened or endangered species may be affected, the Conservation Plan will conform to applicable conditions under any CESA or federal ESA Incidental Take Permit, Biological Opinion, or other consultation documents. Where a Habitat Conservation Plan or similar conservation instrument is applicable, then participation in that plan may constitute compliance with this habitat compensation requirement.</p> <ul style="list-style-type: none"> ▪ Salvage. In instances where salvage and relocation for special status or listed species is feasible, SCE will consult with a qualified conservation and horticulture institute (such as Rancho Santa Ana Botanic Garden in Claremont, California) to design a Salvage and Relocation Plan, to be reviewed and approved by the CPUC in consultation with CDFW prior to disturbance of any occupied special-status plant habitat. The Plan will include at minimum: (a) collection/salvage measures for plants or seed banks, to retain intact soil conditions and maximize success likelihood; (b) details regarding storage of plants or seed banks; (c) location of the proposed recipient site, and detailed site preparation and plant introduction technique; (d) details for topsoil storage, as applicable; (e) time of year that the salvage and replanting or seeding will occur and the methodology of the replanting; (f) a description of the irrigation method(s), if used; (g) success criteria; and (h) a detailed monitoring program, commensurate with the Plan's goals. ▪ Horticultural propagation and off-site introduction. If salvage and relocation is not believed to be feasible for special-status plants, then the applicant will develop and implement an appropriate propagation and relocation strategy, based on the life history of the species affected. The strategy will include at minimum: (a) collection/salvage measures for plant materials or seed banks, to retain intact soil conditions and maximize success likelihood; (b) details regarding storage of plant, plant materials, or seed banks; (c) location of the proposed propagation facility, and proposed methods; (d); time of year that the salvage and other practices will occur; (e) success criteria; and (f) a detailed monitoring program, commensurate with the strategy's goals. 		
Burrowing Owl [MM B-6 supersedes APM Bio-3]	<p>MM B-6: Survey for and Avoid Burrowing Owl. This mitigation measures supersedes APM BIO-3 (Burrowing Owl).</p> <p>Preconstruction surveys for burrowing owl shall be conducted in project areas within 30 days of construction. If any ground disturbing activities are planned during the burrowing owl nesting season (approximately February 1 through August 31), avoidance measures shall include a no construction buffer zone of a minimum distance of 250 feet, consistent with the Staff Report on Burrowing Owl Mitigation (CDFG, 1995). SCE shall comply with CDFW burrowing owl mitigation guidelines as detailed in the Staff Report on Burrowing Owl Mitigation (CDFG, 2012) or more recent updates, if available.</p>	Review survey results and ensure buffer zone (if needed) and compliance with CDFW mitigation guidelines	

Table 5A. Mitigation Monitoring Plan – Preconstruction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
<p>Tehachapi Slender Salamander [MM B-7 supersedes APM Bio-4]</p>	<p>MM B-7: Survey Requirements and Avoidance Relocation Measures for Tehachapi Slender Salamander. This mitigation measure supersedes APM BIO-4 (Tehachapi Slender Salamander).</p> <p>Pre-construction surveys and avoidance measures shall be implemented for Tehachapi slender salamander subject to applicable permit requirements. For construction activities involving ground disturbance in or directly adjacent to occupied or suitable habitat for the Tehachapi slender salamander, preconstruction surveys shall be conducted by a qualified biologist, approved by the CPUC, prior to disturbance to determine if Tehachapi slender salamander individuals are present in the disturbance zone. If visual searches are used for pre-construction surveys, they shall be conducted no earlier than 72 hours prior to disturbance, and if pitfall trapping is used, it shall be conducted no earlier than 5 days prior to disturbance.</p> <p>If Tehachapi slender salamanders are located, individuals within the disturbance zone shall be captured and relocated to the closest suitable habitat area containing talus, as and to the extent required by USFWS and/or CDFW in applicable permits or habitat conservation plans. If project activities are located within oak woodlands and ravines, construction activities shall avoid displacement of rocks, logs, bark, and other debris in thick leaf litter, near talus slopes. Biological monitors shall monitor all construction activities in occupied or suitable Tehachapi slender salamander habitat to ensure that construction activities do not impact this species.</p> <p>Pre-construction survey methods, avoidance measures, and final mitigation requirements for this species shall be established by USFWS and CDFW. Permit applications submitted to CDFW shall include, at a minimum, the applicable mitigation measures from this document.</p>	<p>Review CDFW authorization, survey results, and habitat restoration plan.</p>	

Table 5A. Mitigation Monitoring Plan – Preconstruction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
<p>Nesting Birds [MM B-9 supersedes APM Bio-2]</p>	<p>MM B-9: Prepare Nesting Birds Management Plan and Conduct Surveys. This mitigation measure supersedes APM BIO-2 (Pre-construction Surveys for Nesting Birds/Raptors).</p> <p>Within one week (7 days) prior to the start of construction in a particular area during nesting season, a nesting survey shall be conducted within project disturbance areas and a 500 foot buffer surrounding all project disturbance areas (wherever legal access is available). At a minimum, nesting surveys shall be conducted from February 1 to August 31. A qualified biologist will determine if nesting activity is occurring either prior to or after this February-August period and nesting surveys will be performed accordingly.</p> <p>Prior to the start of construction, SCE shall prepare a draft Nesting Bird Management Plan, in consultation with the CPUC, describing measures to detect birds that may nest on and adjacent to the project site or facilities and to avoid impacts to or take of those birds or their nests during project construction. The draft Nesting Bird Management Plan shall be submitted to the CPUC for review and approval in consultation with USFWS and CDFW. The Nesting Bird Management Plan will be finalized by SCE prior to issuance of CPUC's Notification to Proceed.</p> <p>The Nesting Bird Management Plan will describe avoidance measures, such as buffer distances from active nests, based on the specific nature of project activities, noise, or other disturbance of those activities, the bird species and conservation status, and other pertinent factors. The Plan will specify species' (or groups of species) appropriate buffer distances based on tolerance of human activities. Standard nest buffers shall be 300 feet, and 500 feet for raptor species, or as specified in the CPUC-approved Nesting Bird Management Plan.</p>	<p>Review survey results and Nesting Bird Management Plan. Ensure buffers established and coordination with CDFW/USFWS</p>	
<p>Other Protected Species</p>	<p>MM B-10: Follow APLIC Guidelines. Design, install, and maintain distribution lines and all electrical components in accordance with the Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006 to reduce the likelihood of electrocutions of large birds. Specifically, the phase conductors should be separated by a minimum of 60 inches. Where adequate separation is not feasible, avian protection materials should be used to cover electrical equipment (APLIC, 2006). Before construction begins, SCE shall submit a plan to the CPUC documenting that project design is consistent with APLIC guidelines.</p>	<p>Review plan and ensure design is consistent with APLIC guidelines</p>	
<p>Loss of Sensitive Habitat [MM B-11 supersedes APM Bio-5]</p>	<p>MM B-11: Replace or Offset Sensitive Habitat Loss. This mitigation measures augments APM BIO-5 (Avoidance of Sensitive Habitats). In the case of any conflict between Mitigation Measure B-11 and APM BIO-5, Mitigation Measure B-11 supersedes the APM.</p> <p>Native vegetation in Big Sagebrush Scrub, Blue Oak Woodland, and Foothill Pine-Oak Woodland vegetation communities and aquatic features in construction sites shall be flagged for avoidance prior to construction activities. If avoidance is not feasible, SCE shall implement one or both of the following measures to offset or compensate for those impacts.</p> <ul style="list-style-type: none"> ▪ On-site Restoration. If sensitive vegetation communities or habitat that may support special-status plants or animals are removed or degraded due to temporary project impacts, the applicant shall prepare and implement an Ecological Restoration Plan, to restore any temporary habitat loss within five (5) years of initial disturbance. The Plan will be subject to review and 	<p>Review plan and ensure flagging and proof of compensation.</p>	

Table 5A. Mitigation Monitoring Plan – Preconstruction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
	<p>approval by the CPUC, in coordination with CDFW. The Ecological Restoration Plan’s goal will be to replace habitat values that are damaged or degraded by the project. The plan will include: (a) soil or substrate preparation measures, such as recontouring, decompacting, or imprinting; (b) provisions for soil or substrate salvage and storage; (c) plant material collection and acquisition guidelines, including guidelines for salvaging, storing, and handling seed, cuttings, or rooted plants from the project site, as well as obtaining materials from commercial nurseries or collecting from outside the project area; (d) time of year that the planting or seeding will occur and the methodology of the planting; (e) an irrigation plan or alternate measures to ensure adequate water; (f) quantitative success criteria, to reflect yearly progress and final completion; (g) a detailed monitoring program to evaluate conformance with the success criteria; and (h) contingency measures to remediate the restoration site if success criteria are not met.</p> <ul style="list-style-type: none"> ▪ Compensation. If sensitive vegetation communities or habitat that may support special-status species are removed or degraded, resulting in long-term or permanent project impacts (i.e., impacts lasting more than five [5] years), the applicant will provide for long-term habitat replacement by acquiring and protecting compensation land that will provide habitat value equivalent or greater than habitat removed for the project. Compensation may include off-site habitat restoration or other habitat improvements as needed, to replace habitat components affected by the project. In addition, the applicant will provide funding for long-term conservation management of the compensation land. The applicant will prepare a Compensation Plan, identifying the proposed compensation lands, proposed habitat improvements and long-term management, and specific legal mechanism for long-term preservation (e.g., holder of conservation easement or fee title). The Conservation Plan will be subject to review and approval by the CPUC in consultation with the CDFW. After approval, the Conservation Plan must be implemented in full. In cases where a federally or state-listed threatened or endangered species may be affected, the Conservation Plan will conform to applicable conditions under any CESA or federal ESA Incidental Take Permit, Biological Opinion, or other consultation documents. Where a Habitat Conservation Plan or similar conservation instrument is applicable, then participation in that plan may constitute compliance with this habitat compensation requirement. 		

Table 5A. Mitigation Monitoring Plan – Preconstruction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
Wetlands	<p>MM B-12: Delineate Jurisdictional Wetlands and Waters. Prior to the start of construction, a jurisdictional delineation shall be conducted to describe the type and extent of waters of the United States, including wetlands, and/or waters of the State within the proposed impact area. The presence or absence of wetlands shall be verified through an analysis of any hydrological conditions, hydrophytic vegetation, and hydric soils pursuant to the <i>Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region</i> (USACE, 2008). SCE shall provide copies of delineation reports to the CPUC.</p> <p>Prior to any impacts to jurisdictional areas, permits/agreements from the USACE, the CDFW, and the RWQCB shall be obtained for direct and indirect impacts to areas within these agencies' jurisdictions. SCE would implement all measures required by the permits/agreements as issued by the resource agencies, potentially including constraints on proposed activities and restoration of disturbed jurisdictional areas and/or replacement as determined by the resource agencies. Copies of permits issued shall be provided to the CPUC.</p>	Review reports and ensure permit measure implemented	
Conflicts with Local Policies or Ordinances Protecting Trees	<p>MM B-13: Identify Trees Affected by Project. Prior to construction, SCE shall identify any trees covered by tree protection local policies or ordinances that may be affected by construction of the Proposed Project and consult with applicable jurisdictional agencies prior to any tree alteration, removal, or other impacts. Impacts include trimming or removal of the tree; any construction activities within the dripline of the tree; any trenching or excavation that may damage tree roots, and any other project-related activities that may cause damage to the tree or as specified by local policies or ordinances protecting trees.</p>	Review identification of affected trees and consultation with applicable jurisdictions	

CULTURAL RESOURCES

Known Cultural Resources	<p>MM C-1: Avoid Known Cultural Resources. Where feasible, all impacts to sites identified in the preliminary cultural resource inventories shall be avoided and protected. Wherever a pole, access road, equipment, etc., must be placed or accessed within 100 feet of a recorded, reported, or known archaeological site eligible or potentially eligible for the CRHR, the site will be flagged on the ground as an Environmentally Sensitive Area (ESA) (without disclosure of the exact nature of the environmental sensitivity [i.e., the ESA is not identified as an archaeological site]). Construction equipment shall then be directed away from the ESA, and construction personnel shall be directed not to enter the ESA. Archaeological monitoring of Project construction shall occur in all areas of ground disturbing activity that occur within 100 feet of a cultural resource ESA.</p>	Flag and avoid ESAs and ensure monitor present, where necessary	
Unknown Archaeological Resources	<p>MM C-2: Conduct Cultural Resources Surveys. Prior to construction, and based on final engineering, cultural resource surveys would be conducted in areas of the Area of Direct Impact (ADI) that have not been previously surveyed for the Proposed Project. No work shall be conducted in the previously un-surveyed areas until approval has been received by the CPUC.</p>	Review surveys of any areas that have not previously been surveyed for the project and ensure monitor present, where necessary	

Table 5A. Mitigation Monitoring Plan – Preconstruction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
Unknown Archaeological Resources	<p>MM C-3: Treat Previously Unidentified Cultural Resources Appropriately. SCE shall develop a Cultural Resources Treatment Plan (CRTP) for all known and newly discovered cultural resources within the Project ADI, including procedures for protection and avoidance of ESAs, evaluation and treatment of the unexpected discovery of cultural resources including Native American burials; provisions and procedures for Native American consultation; detailed reporting requirements by the Project Archaeologist; curation of any cultural materials collected during the Project; and requirements to specify that archaeologists and other discipline specialists meet the Professional Qualifications Standards mandated by the California Office of Historic Preservation (OHP).</p> <p>Implementation of the CRTP shall ensure that known and recorded cultural resources will be avoided during construction. Specific protective measures shall be defined in the CRTP to reduce the potential adverse impacts on any presently undetected cultural resources to less-than-significant levels. The CRTP shall be submitted to the CPUC for review and approval at least 30 days before the start of construction.</p>	Review CRTP and ensure cultural resources are avoided	
Unknown Archaeological Resources	<p>MM C-4: Train Construction Personnel Regarding Cultural and Paleontological Resources. Prior to the initiation of construction or ground-disturbing activities, all construction personnel shall be trained, by a qualified archaeologist, regarding the recognition of possible buried cultural resources (i.e., prehistoric and/or historical artifacts, objects, or features) and paleontological resources, and protection of all archaeological and paleontological resources during construction. SCE shall complete training for all construction personnel. Training shall inform all construction personnel of the procedures to be followed upon the discovery of cultural or paleontological materials. All personnel shall be instructed that unauthorized removal or collection of artifacts is a violation of State law and unauthorized collection or disturbance of fossils is prohibited. Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend training so they are aware of the potential for inadvertently exposing buried archaeological deposits or fossils. SCE shall provide a background briefing for supervisory construction personnel describing the potential for exposing cultural resources, the location of any potential ESA and anticipated procedures to treat unexpected discoveries.</p>	Review training materials and ensure construction personnel sign an environmental training attendance sheet	
Paleontological Resources [MM C-5 supersedes APM PA-1]	<p>MM C-5: Develop a Paleontological Resources Management Plan. Prior to construction, SCE shall retain a qualified paleontologist to prepare a Paleontological Resources Management Plan (PRMP). The PRMP shall identify construction impact areas where significant paleontological resources may be encountered and the depths at which those resources are likely to be discovered. The Plan shall outline a coordination strategy to ensure that all construction disturbance in high sensitivity sediments or exceeding 10 feet in depth would be monitored full-time by qualified professionals. The Plan shall also detail methods of recovery; post-excavation preparation and analysis of specimens; final curation of specimens at a recognized, accredited facility; data analysis; and reporting, in the event that paleontological resources are encountered during construction.</p>	Review PRMP and ensure monitoring and implementation of PRMP	

Table 5A. Mitigation Monitoring Plan – Preconstruction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
GEOLOGY AND SOILS			
Seismic-related Ground Failure and Liquefaction	<p>MM G-1: Conduct Geotechnical Investigations for Liquefaction. Because seismically induced liquefaction-related ground failure has the potential to damage or destroy Project components, the design-level geotechnical investigations to be performed by the SCE shall include investigations designed to assess the potential for liquefaction to affect the new Project structures and replacement poles within Cummings and Tehachapi Valleys in areas with potential liquefaction-related impacts. Where these hazards are found to exist, appropriate engineering design and construction measures shall be incorporated into the Project designs as deemed appropriate by the project engineer. Design measures that would mitigate liquefaction-related impacts could include ground improvement of liquefiable zones, installation of flexible bus connections, and incorporation of slack in cables to allow ground deformations without damage to structures. Study results and proposed solutions to mitigate liquefaction shall be provided to the CPUC for review and approval at least 60 days before final Project design.</p>	Review study and design measures	

Table 5A. Mitigation Monitoring Plan – Preconstruction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
HAZARDS AND HAZARDOUS MATERIALS			
Transport, Use, or Disposal of Hazardous Materials	<p>MM H-1: Prepare Worker Environmental Awareness Program (WEAP). SCE shall develop and implement a project-specific WEAP, which shall be submitted to the CPUC for review and approval prior to construction. The WEAP shall include, at a minimum, the following provisions:</p> <ul style="list-style-type: none"> ▪ A presentation shall be prepared by SCE and used to train all site personnel prior to the commencement of work. A record of all trained personnel shall be kept and provided to the CPUC as requested. Crewmembers who have attended the WEAP training presentation shall be provided with a card or a hard hat sticker indicating that they have completed the WEAP training. ▪ Instruction on compliance with Proposed Project mitigation measures, including site-specific biological resources protective measures. ▪ A list of phone numbers of SCE environmental specialist personnel associated with the Proposed Project (archaeologist, biologist, environmental coordinator, and regional spill response coordinator). ▪ Instruction on the individual responsibilities under the Clean Water Act, the project SWPPP, site-specific BMPs, and the location of Material Safety Data Sheets for the project. ▪ Worker Training on Emergency Release Response Procedures to include hazardous materials handling procedures for reducing the potential for a spill during construction, and hazardous material clean up procedures and training to ensure quick and safe cleanup of accidental spills. ▪ Instructions to notify the foreman and regional spill response coordinator in case of a hazardous materials spill or leak from equipment, or upon the discovery of soil or groundwater contamination. The foreman or regional spill response coordinator shall have authority to stop work at that location and to contact the Certified Unified Program Agency (CUPA) (i.e., Kern County Environmental Health Services Department) immediately if unanticipated visual evidence of potential contamination or chemical odors are detected. Work will be resumed at this location after any necessary consultation and approval by the CUPA or other entities as specified by the CUPA. ▪ Instruction that noncompliance with any laws, rules, regulations, or mitigation measures could result in being barred from participating in any remaining construction activities associated with the Proposed Project. 	Review training materials and ensure construction personnel sign an WEAP attendance sheet	

Table 5A. Mitigation Monitoring Plan – Preconstruction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
Residual Herbicides and Pesticides	<p>MM H-2: Identify Pesticide/Herbicide Contamination. Prior to project construction, soil samples shall be collected in construction disturbance areas where the land has historically or is currently being farmed to identify the possibility of and to delineate the extent of pesticide and/or herbicide contamination. Materials containing elevated levels of pesticide or herbicide in areas of trenching or excavation will require special handling and disposal procedures. The local Certified Unified Program Agencies (CUPA) shall be contacted to provide oversight regarding the handling, treatment, and/or disposal options for pesticide or herbicide contaminate soil.</p>	Review soil sample results and ensure compliance with any special handling/disposal procedures	
Wildland Fires [MM H-4 supersedes APM-HAZ-1]	<p>MM H-4: Prepare a Fire Management Plan. SCE's Fire Management Plan shall be project-specific and shall include guidance for preventing, controlling, and extinguishing fires during construction and maintenance activities for the Proposed Project. The Fire Management Plan shall include provisions applicable to construction crews and activities and maintenance crews and activities. The Fire Management Plan shall include protocols to address smoking and fire rules, storage and parking areas, use of gasoline-powered tools, use of spark arresters on construction equipment, road closures, use of a fire guard, fire suppression tools, fire suppression equipment, and training requirements. The Plan shall require construction crews to carry fire extinguishing equipment, prohibit trash burning, restrict smoking to cleared areas, and designate vehicle parking areas away from any dry vegetation to reduce potential ignition of fires at or near the project sites. Additionally the Plan shall include the following measures:</p> <ul style="list-style-type: none"> ▪ Cease work during Red Flag Warning events in areas where grassland or other vegetation would be susceptible to accidental ignition by project activities that could ignite a fire (such as welding or use of equipment that could create a spark by striking rock). During Red Flag Warning events, as issued daily by the National Weather Service, all non-emergency construction and maintenance activities shall cease in affected areas. ▪ Remove hazards from work areas. SCE shall clear dead and decaying vegetation from the work area prior to starting construction and/or maintenance work. The work areas would include only those areas where personnel are active or where equipment is in use or stored, and may include: the Proposed Banducci Substation area and associated new fiber optic and subtransmission equipment; the new fiber optic telecommunications route; construction laydown areas; pull, tension, and splicing sites; access roads; parking pads; and any other sites adjacent to Proposed Project components where personnel are active or where equipment is in use or stored. Cleared dead and decaying vegetation shall either be removed or chipped and spread on site in piles no higher than six (6) inches. 	Review plan and implementation of measures	

Table 5A. Mitigation Monitoring Plan – Preconstruction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
HYDROLOGY AND WATER QUALITY			
Water Quality and Prevention of Soil Erosion	<p>MM HYD-1: Develop Stormwater Pollution Prevention Plan and Implement Best Management Practices. The Applicant shall develop a Stormwater Pollution Prevention Plan (SWPPP), as required by the RWQCB and outlined in General Permit 2009-0009 DWQ, which will describe best management practices (BMPs) to prevent the acceleration of natural erosion and sedimentation rates.. The SWPPP will include a written site-specific Construction Site Monitoring Program (CSMP). A monitoring program, which shall include a reporting requirement to the CPUC, will be established to ensure that the prescribed BMPs are followed during project construction. BMPs shall include but not be limited to the following:</p> <ul style="list-style-type: none"> ▪ Use of silt fences or other sediment containment methods placed around and/or downslope of disturbed areas prior to construction; ▪ Protection of drain inlets from receiving polluted stormwater through the use of filters, such as fabrics, gravel bags, or straw wattles; ▪ Construction of a stabilized construction entrance/exit to prevent tracking onto roadways; ▪ Establishment of exclusionary buffers as necessary to avoid wetlands and streams to the maximum extent feasible; ▪ Establishment of a vehicle storage, maintenance, and refueling area, if needed, to minimize the spread of oil, gas, and engine fluids. Use of oil pans under stationary vehicles is strongly recommended; and ▪ Prohibition on overnight parking of mobile equipment within 100 feet of wetlands, culverts, or creeks. Stationary equipment (e.g., pumps, generators) used or stored within 100 feet of wetlands, culverts, or creeks will be positioned over secondary containment. <p>A worker education program shall be established for all field personnel prior to initiating fieldwork to provide training in the appropriate application and construction of erosion and sediment control measures contained in the SWPPP. This education program will also discuss appropriate hazardous materials management and spill response.</p>	Ensure a SWPPP is prepared and implemented to minimize construction impacts on surface water and groundwater quality	

Table 5A. Mitigation Monitoring Plan – Preconstruction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
TRAFFIC/TRANSPORTATION			
Construction Traffic and Interference with Emergency Access during Construction	<p>MM T-2: Ensure Emergency Access and Response. Prior to construction, SCE shall coordinate with Kern County and emergency service providers regarding emergency access and/or response to the Proposed Project area during construction activities to avoid restricting movements of emergency vehicles. SCE shall ensure that the Proposed Project has considered the relevant Kern County ordinances and building codes so as not to hinder or interfere with emergency access or response (such as, but not limited to, the Kern County Code of Building Regulations: Chapter 17.32, Fire Code and Chapter 17.34, Wildland-Urban Interface Code).</p> <p>Police departments, fire departments, ambulance services, and paramedic services serving the project area shall be notified 30 days in advance by SCE of the proposed locations, nature, timing, and duration of any construction activities and advised of any access restrictions that could impact their effectiveness.</p>	Review notification and ensure coordination	

6.2 Mitigation Monitoring Plan – During Construction Measures

Table 5B. Mitigation Monitoring Plan – During Construction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
AGRICULTURAL RESOURCES			
Conversion of Important Farmland	<p>MM AG-1: Minimize Impacts to Agricultural Resources. For project components sited on or adjacent to Important Farmland, SCE shall:</p> <ul style="list-style-type: none"> ▪ Minimize paving and ground-disturbing activities to the maximum extent practical within agricultural fields to retain agricultural soil characteristics. 	Review notices, list of landowners, and complaints report(s) to minimize impacts to Important Farmland	
AIR QUALITY			
Construction-Phase Air Quality	<p>MM AQ-1: Implement EKAPCD Dust Control Measures. SCE shall implement the following measures during site preparation and construction:</p> <ul style="list-style-type: none"> ▪ All soil excavated or graded should be sufficiently watered or treated with non-toxic soil stabilizers to prevent excessive dust. Watering should occur as needed with complete coverage of disturbed soil areas. Watering should be a minimum of twice daily on unpaved/untreated roads and on disturbed soil areas with active operations. ▪ All clearing, grading, earth moving and excavation activities should cease: during periods of winds greater than 20 mph (averaged over one hour), if disturbed material is easily windblown; or when dust plumes of 20 percent or greater opacity impact public roads, occupied structures, or neighboring property. ▪ All fine material transported offsite should be sufficiently watered, treated with non-toxic soil stabilizers, or securely covered to prevent excessive dust. ▪ If more than 5,000 cubic yards of fill material will be imported to or exported from the site, then all haul trucks should be required to exit the site via an access point where a gravel pad or grizzly has been installed. ▪ Areas disturbed by clearing, earth moving, or excavation activities should be minimized at all times. ▪ Stockpiles of soil or other fine loose material shall be stabilized by watering or other appropriate method to prevent wind-blown fugitive dust. ▪ Where acceptable to the fire department, weed control should be accomplished by mowing instead of discing, thereby, leaving the ground undisturbed and with a mulch covering. ▪ Once initial leveling has ceased all inactive soil areas within the construction site should either be seeded and watered until plant growth is evident, treated with a dust palliative, or watered twice daily until soil has sufficiently crusted to prevent fugitive dust emission. ▪ All active disturbed soil areas should be sufficiently watered or treated with non-toxic soil stabilizers to prevent excessive dust, but no less than twice per day. ▪ Onsite vehicle speed should be limited to 15 mph. 	Ensure SCE implements measures and particulate matter emissions are minimized during construction	

Table 5B. Mitigation Monitoring Plan – During Construction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
	<ul style="list-style-type: none"> ▪ All areas with vehicle traffic should be paved, treated with dust palliatives, or watered a minimum of twice daily. ▪ Streets adjacent to the project site should be kept clean and accumulated silt removed. <p>Access to the site⁴ should be by means of an apron into the project from adjoining surfaced roadways. The apron should be surfaced or treated with dust palliatives. If operating on soils that cling to the wheels of the vehicles, a grizzly or other such device should be used on the road exiting the project, immediately prior to the pavement, in order to remove most of the soil material from the vehicle's tires.</p>		
BIOLOGICAL RESOURCES			
Special-Status Plants [MM B-1 supersedes APM Bio-1 and APM Bio-5]	<p>MM B-1: Perform Biological Resource Surveys and Construction Monitoring During construction, any special-status or listed species identified shall be reported to the CPUC within 24 hours. SCE shall provide a report documenting biological surveys conducted, construction activities observed, biological resources identified, and compliance with APMs and MMs to the CPUC on a weekly basis. Maps of special-status or listed biological resources identified during project surveys and monitoring activities shall be provided to the CPUC on a weekly basis.</p> <ul style="list-style-type: none"> ▪ Sensitive plant surveys shall be conducted by a qualified botanist, approved by the CPUC, familiar with plants in the Cummings Valley. Field surveys will be conducted at the appropriate time of year to locate and identify the target species. Surveys will focus on identifying whether state and federally listed species as well as California Native Plant Society special-status plants are present. In addition, potential habitat to support special-status plant species and sensitive vegetation communities will be identified. ▪ Clearance surveys shall be conducted no more than 7 days prior to the start of construction in a particular area to identify potential plant and animal species that may be affected by construction activities. Clearance surveys will include a field survey by a qualified botanist and wildlife biologist and will include 500-feet beyond the border of any proposed project disturbance areas (where these areas are legally accessible). Clearance surveys will be submitted to the CPUC for review and verification prior to construction. ▪ Biological monitors shall monitor construction activities in areas with special-status species, native vegetation, wildlife habitat, or unique biological resources to ensure such resources are avoided to the extent feasible. 	Review survey results and reports to identify and Minimize impacts to sensitive biological resources	
Special-Status Plants	<p>MM B-2: Establish Special-status Plants Buffers. If special-status plants are found during field surveys, a buffer shall be established around the plants or plant populations within which no construction work is permitted unless the CPUC determines that such work may proceed without significantly impacting the special-status and listed species. The size of the buffer shall be adequate to ensure that plants are not significantly disturbed and shall be determined by a</p>	Review buffer areas, proof of compensation, Salvage and Relocation Plan and propagation/relocation strategy, if needed	

Table 5B. Mitigation Monitoring Plan – During Construction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
	<p>qualified biologist. Construction monitors shall ensure that work crews are aware of the buffer and related work restrictions.</p> <p>If special-status plants cannot be avoided, SCE shall coordinate with the CPUC, CDFW, and USFWS to determine whether construction and operation impacts of the Proposed Project would be significant. Impacts to special-status plants will be considered significant if listed threatened or endangered species would be directly or indirectly affected; or plants presumed extinct in California (California Rare Plant Rank [CRPR] 1A) would be directly or indirectly affected; or ten (10) percent or more of a local occurrence of CRPR 1B or CRPR 2 species would be directly or indirectly affected.</p> <p>In the event any of the above are triggered, SCE shall coordinate with the CPUC, CDFW, and USFWS to design and implement appropriate mitigation measures. These measures may include, but would not be limited to:</p> <ul style="list-style-type: none"> ▪ Avoidance. Project construction would be adjusted as necessary to avoid or minimize impacts to special-status plants and provide a minimum 25 foot buffer area surrounding each avoided occurrence, where no project activities will take place. ▪ Off-site Compensation. SCE would provide compensation lands to protect off-site special-status plant occurrence(s). Compensation lands would protect acreage, habitat suitability, and overall numbers of each special-status plant at no less than a 1:1 ratio or levels comparable to the project's impacts. In addition, the applicant will provide funding for long-term conservation management of the compensation land. The applicant will prepare a Compensation Plan, identifying the proposed compensation lands, proposed habitat improvements and long-term management, and specific legal mechanism for long-term preservation (e.g., holder of conservation easement or fee title). The Conservation Plan will be subject to review and approval by the CPUC in consultation with the CDFW and, upon approval, will be implemented in full. In cases where a federally or state-listed threatened or endangered species may be affected, the Conservation Plan will conform to applicable conditions under any CESA or federal ESA Incidental Take Permit, Biological Opinion, or other consultation documents. Where a Habitat Conservation Plan or similar conservation instrument is applicable, then participation in that plan may constitute compliance with this habitat compensation requirement. ▪ Salvage. In instances where salvage and relocation for special status or listed species is feasible, SCE will consult with a qualified conservation and horticulture institute (such as Rancho Santa Ana Botanic Garden in Claremont, California) to design a Salvage and Relocation Plan, to be reviewed and approved by the CPUC in consultation with CDFW prior to disturbance of any occupied special-status plant habitat. The Plan will include at minimum: (a) collection/salvage measures for plants or seed banks, to retain intact soil conditions and maximize success likelihood; (b) details regarding storage of plants or seed banks; (c) location of the proposed recipient site, and detailed site preparation and plant introduction technique; (d) details for topsoil storage, as applicable; (e) time of year that the salvage and replanting or seeding will occur and the methodology of the replanting; (f) a description of the 		

Table 5B. Mitigation Monitoring Plan – During Construction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
	<p>irrigation method(s), if used; (g) success criteria; and (h) a detailed monitoring program, commensurate with the Plan's goals.</p> <ul style="list-style-type: none"> ▪ Horticultural propagation and off-site introduction. If salvage and relocation is not believed to be feasible for special-status plants, then the applicant will develop and implement an appropriate propagation and relocation strategy, based on the life history of the species affected. The strategy will include at minimum: (a) collection/salvage measures for plant materials or seed banks, to retain intact soil conditions and maximize success likelihood; (b) details regarding storage of plant, plant materials, or seed banks; (c) location of the proposed propagation facility, and proposed methods; (d); time of year that the salvage and other practices will occur; (e) success criteria; and (f) a detailed monitoring program, commensurate with the strategy's goals. 		
Special-Status Plants	<p>MM B-3: Minimize Noxious Weeds. Precautions shall be taken to minimize the introduction of any invasive weeds. Construction vehicles and equipment shall be clean before they arrive at work areas in the project corridor. Any landscaping involving vegetation other than trees and shrubs shall consist of native seed mix or other ecologically appropriate, non-invasive plants. Only weed-free straw or mulch shall be used.</p>	Ensure noxious weeds are not introduced	
Special-Status Wildlife	<p>MM B-4: Manage Trash and Microtrash. Trash and microtrash shall be removed from work areas daily. Construction monitors shall conduct daily sweeps of work areas to ensure all trash and microtrash has been collected and removed. Microtrash in the form of construction materials such as nuts and bolts or other small materials must be secured at the end of each work day in secured, closed containers.</p>	Ensure trash and microtrash are secured and/or removed daily	
Special-Status Wildlife	<p>MM B-5: Prevent Wildlife Entrapment. SCE shall ensure that all potential wildlife pitfalls (trenches, bores, portable water tanks, and other excavations) have been backfilled or securely covered at the end of each workday. If backfilling or covering is not feasible, these potential pitfalls will be sloped at a 3:1 ratio at the ends as wildlife escape ramps. The biological monitor shall inspect all potential pitfalls no fewer than three times daily throughout and at the end of each workday.</p> <p>All pipes or other construction materials or supplies shall be covered or capped in storage or laydown areas. No pipes or tubing is to be left open either temporarily or permanently, except during use or installation. Any construction pipe, culvert, or other hollow materials shall be inspected for wildlife before it is moved, buried, or capped.</p> <p>Should native wildlife become trapped in excavations, materials, or other project-related situation, the biological monitor shall remove it (if feasible and safe) or immediately contact CDFW and the CPUC. Any native wildlife encountered shall be allowed to leave the area unharmed.</p> <p>If injured native wildlife is found on or near Project access roads, work areas, or the ROW, whether or not the injuries are obviously project-related, SCE shall contact and work with a local wildlife rehabilitator, animal control, CDFW, or other qualified party to obtain assistance</p>	Ensure wildlife pitfalls are backfilled or covered at the end of each workday and are inspected by a biological monitor and the appropriate authorities are contacted regarding trapped, injured or dead animals.	

Table 5B. Mitigation Monitoring Plan – During Construction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
	<p>for the animal as soon as possible. SCE shall bear the costs of veterinary treatment and rehabilitation for any native injured wildlife found on or near Project access roads, work areas, or the ROW and any native wildlife injured by Project-related activities.</p> <p>Dead animals of non-special-status species found on Project access roads, work areas, or the ROW shall be reported to the appropriate local animal control agency within 24 hours or a biological monitor shall safely move the carcass out of the road or work area as needed. Dead animals of special-status species found on Project roads, work areas, or the ROW shall be reported to the appropriate agency within 24 hours, and if required, the carcass handled according to agency guidelines.</p>		
<p>Burrowing Owl [MM B-6 supersedes APM Bio-3]</p>	<p>MM B-6: Survey for and Avoid Burrowing Owl. Construction activities shall be scheduled and planned to avoid burrowing owls and their burrows. If occupied burrows cannot be avoided, an appropriate relocation strategy shall be developed in conjunction with CDFW. Biological monitors shall monitor all construction activities that have the potential to impact active burrows.</p>	<p>Review survey results and ensure buffer zone (if needed) and compliance with CDFW mitigation guidelines</p>	
<p>Tehachapi Slender Salamander [MM B-7 supersedes APM Bio-4]</p>	<p>MM B-7: Survey Requirements and Avoidance Relocation Measures for Tehachapi Slender Salamander. This mitigation measure supersedes APM BIO-4 (Tehachapi Slender Salamander).</p> <p>If Tehachapi slender salamanders are located, individuals within the disturbance zone shall be captured and relocated to the closest suitable habitat area containing talus, as and to the extent required by USFWS and/or CDFW in applicable permits or habitat conservation plans. If project activities are located within oak woodlands and ravines, construction activities shall avoid displacement of rocks, logs, bark, and other debris in thick leaf litter, near talus slopes. Biological monitors shall monitor all construction activities in occupied or suitable Tehachapi slender salamander habitat to ensure that construction activities do not impact this species.</p> <p>When occupied habitat for Tehachapi slender salamander is directly impacted by construction activities involving ground disturbance, a habitat restoration plan shall be developed for the Tehachapi slender salamander that specifies, at a minimum, the following: (1) the location of creation, enhancement, or restoration planting sites; (2) a complete description of the hardscape (e.g., talus, rocks, and logs) to be installed and where hardscape materials will be deposited, along with desired leaf and litter cover; (3) a description of how the existing typical hydrologic regime will support Tehachapi slender salamander habitat; (4) the quantity and species of plants to be planted; (5) planting procedures, including the use of soil preparation and irrigation; (6) methods for the removal of non-native plants; (7) a schedule and action plan to maintain and monitor the creation/enhancement/ restoration area; (8) a list of criteria (e.g., growth, percent plant cover, plant diversity, debris, and hardscape) and performance standards by which to measure success of the creation/enhancement/restoration; and (9) contingency measures in the event that creation/enhancement/restoration efforts are not successful. Performance standards shall be defined by a site-specific pre-construction study of known locations occupied by</p>	<p>Review CDFW authorization, survey results, and habitat restoration plan.</p>	

Table 5B. Mitigation Monitoring Plan – During Construction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
	<p>Tehachapi slender salamander, including evaluation of specific cover; distance to water; water inundation levels; percent canopy cover; percent shrub and grass cover; presence of talus, boulder, log, or other refugia; and other factors. The restoration plan performance standard under this mitigation measure is to create, restore, or enhance areas so that Tehachapi slender salamanders can naturally colonize these areas or Tehachapi slender salamanders within the disturbance zone can be successfully relocated to these areas. The plan shall be prepared by SCE and submitted to the CPUC and the resource agencies for approval prior to ground disturbance activities that would have an impact on occupied habitat for the Tehachapi slender salamander.</p>		
California Condor	<p>MM B-8: Halt Construction when California Condor Present. SCE shall retain a qualified biologist with demonstrated knowledge of California condor identification to monitor all construction activities within the project area. If a California condor is present in any project work area (except flying over), construction activities shall be halted in that area (and within 500 feet of the condor) and the animal shall be allowed to leave the area on its own. All condor sightings in the project area will be immediately reported to the USFWS, CDFW, and the CPUC. Construction may resume upon the departure of the California condor and verification by a qualified biologist.</p>	<p>Ensure biological monitor present, construction activities are halted if a condor is present, and all sightings are reported</p>	
Nesting Birds [MM B-9 supersedes APM Bio-2]	<p>MM B-9: Implement Nesting Birds Management Plan and Conduct Surveys. This mitigation measure supersedes APM BIO-2 (Pre-construction Surveys for Nesting Birds/Raptors). Clearing of any vegetation (including agricultural fields and grasslands), site preparation in open or barren areas, or other project-related activities that may adversely affect breeding birds shall be scheduled outside the nesting season as feasible. Nesting season is generally February 1 to August 31, but varies with region, environmental factors, and species.</p> <p>Within one week (7 days) prior to the start of construction in a particular area during nesting season, a nesting survey shall be conducted within project disturbance areas and a 500 foot buffer surrounding all project disturbance areas (wherever legal access is available). At a minimum, nesting surveys shall be conducted from February 1 to August 31. A qualified biologist will determine if nesting activity is occurring either prior to or after this February-August period and nesting surveys will be performed accordingly.</p> <p>If an active nest is found, a buffer shall be established around the nest in which no construction work is permitted. The size of the buffer will be adequate to ensure that the nest, nesting birds, and chicks (including fledglings and precocial chicks) are not disturbed. For nests of raptors and special-status bird species, the size of the buffer will be determined based on a project-specific nesting bird management plan approved by the appropriate resource agencies or consultation with the appropriate resource agencies. For all other nests, the size of the buffer will be determined by a qualified biologist. Construction monitors will ensure that work crews are aware of the buffer and related work restrictions. The buffer zone will remain in place until the young</p>	<p>Review survey results and Nesting Bird Management Plan. Ensure buffers established and coordination with CDFW/USFWS</p>	

Table 5B. Mitigation Monitoring Plan – During Construction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
	<p>have fledged and are no longer dependent on the nest or the nest is no longer active, as determined by a qualified biologist.</p> <p>An active nest is defined as a nest with eggs or chicks, or as otherwise defined by CDFW</p> <p>If an active nest must be moved during the nesting season, SCE shall coordinate with the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service to obtain approval prior to moving the nest.</p>		
Other Protected Species	<p>MM B-10: Follow APLIC Guidelines. Design, install, and maintain distribution lines and all electrical components in accordance with the Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006 to reduce the likelihood of electrocutions of large birds. Specifically, the phase conductors should be separated by a minimum of 60 inches. Where adequate separation is not feasible, avian protection materials should be used to cover electrical equipment (APLIC, 2006). Before construction begins, SCE shall submit a plan to the CPUC documenting that project design is consistent with APLIC guidelines.</p>	Review plan and ensure design is consistent with APLIC guidelines	

CULTURAL RESOURCES

Known Cultural Resources	<p>MM C-1: Avoid Known Cultural Resources. Where feasible, all impacts to sites identified in the preliminary cultural resource inventories shall be avoided and protected. Wherever a pole, access road, equipment, etc., must be placed or accessed within 100 feet of a recorded, reported, or known archaeological site eligible or potentially eligible for the CRHR, the site will be flagged on the ground as an Environmentally Sensitive Area (ESA) (without disclosure of the exact nature of the environmental sensitivity [i.e., the ESA is not identified as an archaeological site]). Construction equipment shall then be directed away from the ESA, and construction personnel shall be directed not to enter the ESA. Archaeological monitoring of Project construction shall occur in all areas of ground disturbing activity that occur within 100 feet of a cultural resource ESA.</p>	Flag and avoid ESAs and ensure monitor present, where necessary	
Unknown Archaeological Resources	<p>MM C-2: Conduct Cultural Resources Surveys. Supplemental cultural resource surveys of all new areas that would be affected shall be conducted by a qualified professional archaeologist. Any identified cultural resource would be documented and evaluated for its eligibility for listing in the CRHR. A supplemental technical report shall be provided to the CPUC discussing the supplemental surveys, documented and evaluated cultural resources, potential impacts, and avoidance and minimization measures. Ideally, cultural resources found to meet any of the CRHR eligibility criteria would be avoided and preserved in place. If avoidance is not feasible, then SCE and CPUC shall develop and implement appropriate mitigation measures to reduce any impacts to a less-than-significant level and all ground disturbing activities would be monitored by a qualified archaeologist.</p>	Review surveys of any areas that have not previously been surveyed for the project and ensure monitor present, where necessary	

Table 5B. Mitigation Monitoring Plan – During Construction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
Unknown Archaeological Resources	MM C-3: Treat Previously Unidentified Cultural Resources Appropriately. If previously unidentified cultural resources are unearthed during construction of the Proposed Project, construction work in the immediate area of the find shall be halted and directed away from the discovery until a qualified professional archaeologist assesses the significance of the resource. The archaeologist, in consultation with SCE and the CPUC, shall make the necessary plans for evaluation of the CRHR-eligibility of find(s) and for the assessment and mitigation of impacts if the finds are found to be historically significant according to CEQA (CEQA Guidelines Section 15064.5(a)).	Review CRTP and ensure cultural resources are avoided	
Unknown Archaeological Resources	MM C-4: Train Construction Personnel Regarding Cultural and Paleontological Resources. A record of all trained personnel shall be kept and provided to the CPUC as requested.	Review training materials and ensure construction personnel sign an environmental training attendance sheet	
Paleontological Resources [MM C-5 supersedes APM PA-1]	MM C-5: Implement Paleontological Resources Management Plan. The Plan shall outline a coordination strategy to ensure that all construction disturbance in high sensitivity sediments or exceeding 10 feet in depth would be monitored full-time by qualified professionals. The Plan shall also detail methods of recovery; post-excavation preparation and analysis of specimens; final curation of specimens at a recognized, accredited facility; data analysis; and reporting, in the event that paleontological resources are encountered during construction.	Review PRMP and ensure monitoring and implementation of PRMP	
Paleontological Resources	MM C-6: Monitor Construction for Paleontology. Based on the paleontological sensitivity assessment and Paleontological Resource Management Plan consistent with Mitigation Measure C-5 (Develop a Paleontological Resource Management Plan), SCE shall ensure that full-time construction monitoring is conducted by the Paleontological Resource Monitor in areas determined to have high sensitivity. Sediments of moderate or undetermined sensitivity shall be monitored by a Paleontological Resource Monitor on a part-time basis (as determined by the Qualified Paleontologist). Monitoring will entail the visual inspection of excavated or graded areas and trench sidewalls. The monitor may also screen sediments to check for the presence of microvertebrates if they are believed to be present. In the event that a paleontological resource is discovered, the monitor shall have the authority to temporarily divert the construction equipment around the find until it is assessed for scientific significance, and collected. Mitigation Measure C-6 does not apply to any drilling construction activities.	Ensure monitor present in areas determined to have high sensitivity	
Disturbance of Human Remains	MM C-8: Treat Human Remains Appropriately. If human remains are unearthed during construction activities, construction work within 100 feet of the discovery shall be halted and directed away from the discovery until the county coroner can determine whether the remains are those of a Native American. If they are those of a Native American, the following would apply: <ul style="list-style-type: none"> ▪ The coroner shall contact the Native American Heritage Commission. ▪ If discovered human remains are determined to be Native American remains, and are released by the coroner, these remains shall be left in situ and covered by fabric or other temporary barriers. 	Ensure work within 100 feet of the find stops and the find is treated in compliance with State and federal regulations	

Table 5B. Mitigation Monitoring Plan – During Construction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
	<ul style="list-style-type: none"> ▪ The human remains shall be protected until SCE, the landowner, and the Native American Heritage Commission come to a decision on the final disposition of the remains. <p>According to the California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and willful disturbance of human remains is a felony (Section 7052).</p>		
HAZARDS AND HAZARDOUS MATERIALS			
Transport, Use, or Disposal of Hazardous Materials	<p>MM H-1: Implement Worker Environmental Awareness Program (WEAP). New workers not present during original pre-construction Environmental Awareness Program shall be trained prior to working on site.</p> <ul style="list-style-type: none"> ▪ A presentation shall be prepared by SCE and used to train all site personnel prior to the commencement of work. A record of all trained personnel shall be kept and provided to the CPUC as requested. Crewmembers who have attended the WEAP training presentation shall be provided with a card or a hard hat sticker indicating that they have completed the WEAP training. 	Review training materials and ensure construction personnel sign an WEAP attendance sheet	
Residual Herbicides and Pesticides	<p>MM H-2: Identify Pesticide/Herbicide Contamination. Standard dust suppression procedures (as defined in Mitigation Measure AQ-1 [Implement EKAPCD Dust Control Measures]) shall be used in these construction areas to reduce airborne emissions of these contaminants and reduce the risk of exposure to workers and the public.</p>	Review soil sample results and ensure compliance with any special handling/disposal procedures	
Discovery of Unknown Contamination	<p>MM H-3: Observe Exposed Soil for Evidence of Contamination. During grading or excavation work, the construction contractor shall observe the exposed soil for visual evidence of contamination. If visual contamination indicators are observed during construction, the contractor shall segregate any suspect soil already excavated, stop work until sampling and testing is done to determine appropriate treatment and disposal, and appropriate measures are taken to protect human health and the environment. The contractor shall comply with all local, State, and federal requirements for sampling and testing, and subsequent removal, transport, and disposal of hazardous materials/waste. Additionally, in the event that evidence of contamination is observed, the contractor shall document the exact location of the contamination and shall immediately notify the local CUPA and CPUC, describing proposed actions. A weekly report listing encounters with contaminated soils and describing actions taken shall be submitted to the CPUC.</p>	Observe soil and ensure potentially contaminated soil is segregated and work is stopped until sampling and testing is completed	
Wildland Fires [MM H-4 supersedes APM-HAZ-1]	<p>MM H-4: Implement the approved Fire Management Plan. During construction, the approved Fire Management Plan shall be implemented and any reporting requirements within adhered to.</p>	Review plan and implementation of measures	

Table 5B. Mitigation Monitoring Plan – During Construction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
HYDROLOGY AND WATER QUALITY			
Water Quality and Prevention of Soil Erosion	MM HYD-1: Develop Stormwater Pollution Prevention Plan and Implement Best Management Practices. All BMPs shall be inspected on a weekly basis, and at least once every 24 hour period during extended storm events. BMPs shall be inspected as described in the SWPPP, maintained on a regular basis, and replaced as necessary through the course of construction. For each inspection required, an inspection checklist will be completed using a form as described in Attachment C of General Permit 2009-0009 DWQ. This checklist will remain onsite with the SWPPP. Compliance with these requirements will be ensured by the on-site construction contractor.	Ensure a SWPPP is prepared and implemented to minimize construction impacts on surface water and groundwater quality	
Groundwater Supply	MM HYD-2: Use Non-potable Water for Dust Control or Soil Compaction. Project water supply for dust control or soil compaction activities shall be obtained from non-potable sources, if reasonably available from local water purveyors, and ensured in a water contract through a local water agency or district.	Ensure non-potable water is used for dust control and soil compaction	
Groundwater Supply	MM HYD-3: Dewater Construction Site As Needed. If groundwater is unexpectedly encountered during construction, operation, or decommissioning of the Project, dewatering activities shall be performed in compliance with the California Stormwater Quality Association (CASQA) Handbook for Construction or other similar guidelines, as approved by the Central Valley and/or Lahontan RWQCB, as applicable based on jurisdiction. The Applicant shall submit a written description of all executed dewatering activities, including steps taken to return encountered groundwater to the subsurface and/or to dispose of the dewatered groundwater upon the completion of dewatering activities at the affected site(s).	Review dewatering activities reports	
NOISE			
Construction Noise	MM N-1: Limit Construction Noise to Daytime Hours. SCE shall limit grading, scraping, hole augering and pole installation to daylight hours, between 6:00 a.m. and 9:00 p.m. Exceptions for work outside of these hours shall be allowed for project safety or to take advantage of the limited times when power lines can be taken out of service or as determined to be warranted by the CPUC. If nighttime work is needed because of clearance restrictions on power lines, SCE shall take appropriate measures to minimize disturbance to local residents by informing them in advance of the work schedule and probable inconveniences.	Ensure specified activities limited to daylight hours. Review notification (if nighttime work is necessary)	
Construction Noise	MM N-2: Minimize Construction Vehicle and Traffic Noise. SCE shall maintain construction equipment and vehicle mufflers in accordance with equipment vendor specifications on all engines used in construction. Where feasible, construction traffic shall be routed to avoid noise-sensitive areas, such as residences, schools, religious facilities, hospitals, and parks.	Ensure implementation during construction such that construction noise is minimized and noise-related complaints from nearby residents are minimized	

Table 5B. Mitigation Monitoring Plan – During Construction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
TRAFFIC/TRANSPORTATION			
Construction Traffic and Interference with Emergency Access during Construction	MM T-1: Restrict Lane Closures. SCE shall restrict all necessary lane closures or obstructions on major roadways associated with overhead or underground construction activities to off-peak periods in congested areas to reduce traffic delays. Lane closures must not occur between 6:00 and 9:30 a.m. or between 3:30 and 6:30 p.m., unless otherwise authorized in writing by the responsible public agency issuing an encroachment permit	Ensure lane closures during off-peak hours and traffic delays minimized	
Construction Traffic and Interference with Emergency Access during Construction	MM T-2: Ensure Emergency Access and Response. At locations where roads will be temporarily blocked, work crews shall be ready at all times to accommodate emergency vehicles through immediately stopping work for emergency vehicle passage and/or facilitating the use of short detours and alternate routes in conjunction with local agencies.	Review notification and ensure coordination	
Construction Traffic and Interference with Emergency Access during Construction	MM T-3: Implement Traffic Management Plan. SCE shall follow its standard safety practices, including installing appropriate barriers between work zones and transportation facilities, posting adequate signs, and using proper construction techniques. SCE is a member of the California Joint Utility Traffic Control Committee, which published the California Joint Utility Traffic Control Manual (2010). SCE will follow the recommendations in this manual regarding basic standards for the safe movement of traffic on highways and streets in accordance with Section 21400 of the CVC. These recommendations include provisions for safe access of police, fire, and other rescue vehicles.	Ensure traffic safety practices are implemented	

6.3 Mitigation Monitoring Plan – Post-Construction Measures

Table 5C. Mitigation Monitoring Plan – Post-Construction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
BIOLOGICAL RESOURCES			
Other Protected Species	<p>MM B-10: Follow APLIC Guidelines. Design, install, and maintain distribution lines and all electrical components in accordance with the Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006 to reduce the likelihood of electrocutions of large birds. Specifically, the phase conductors should be separated by a minimum of 60 inches. Where adequate separation is not feasible, avian protection materials should be used to cover electrical equipment (APLIC, 2006). Before construction begins, SCE shall submit a plan to the CPUC documenting that project design is consistent with APLIC guidelines.</p>	Review plan and ensure design is consistent with APLIC guidelines	
Loss of Sensitive Habitat [MM B-11 supersedes APM Bio-5]	<p>MM B-11: Replace or Offset Sensitive Habitat Loss. This mitigation measures augments APM BIO-5 (Avoidance of Sensitive Habitats). In the case of any conflict between Mitigation Measure B-11 and APM BIO-5, Mitigation Measure B-11 supersedes the APM.</p> <p>Native vegetation in Big Sagebrush Scrub, Blue Oak Woodland, and Foothill Pine-Oak Woodland vegetation communities and aquatic features in construction sites shall be flagged for avoidance prior to construction activities. If avoidance is not feasible, SCE shall implement one or both of the following measures to offset or compensate for those impacts.</p> <ul style="list-style-type: none"> ▪ On-site Restoration. If sensitive vegetation communities or habitat that may support special-status plants or animals are removed or degraded due to temporary project impacts, the applicant shall prepare and implement an Ecological Restoration Plan, to restore any temporary habitat loss within five (5) years of initial disturbance. The Plan will be subject to review and approval by the CPUC, in coordination with CDFW. The Ecological Restoration Plan's goal will be to replace habitat values that are damaged or degraded by the project. The plan will include: (a) soil or substrate preparation measures, such as recontouring, decompacting, or imprinting; (b) provisions for soil or substrate salvage and storage; (c) plant material collection and acquisition guidelines, including guidelines for salvaging, storing, and handling seed, cuttings, or rooted plants from the project site, as well as obtaining materials from commercial nurseries or collecting from outside the project area; (d) time of year that the planting or seeding will occur and the methodology of the planting; (e) an irrigation plan or alternate measures to ensure adequate water; (f) quantitative success criteria, to reflect yearly progress and final completion; (g) a detailed monitoring program to evaluate conformance with the success criteria; and (h) contingency measures to remediate the restoration site if success criteria are not met. ▪ Compensation. If sensitive vegetation communities or habitat that may support special-status species are removed or degraded, resulting in long-term or permanent project impacts (i.e., impacts lasting more than five [5] years), the applicant will provide for long-term habitat replacement by acquiring and protecting compensation land that will provide habitat value equivalent or greater than habitat removed for the project. Compensation may include off-site 	Review plan and ensure flagging and proof of compensation.	

Table 5C. Mitigation Monitoring Plan – Post-Construction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
	<p>habitat restoration or other habitat improvements as needed, to replace habitat components affected by the project. In addition, the applicant will provide funding for long-term conservation management of the compensation land. The applicant will prepare a Compensation Plan, identifying the proposed compensation lands, proposed habitat improvements and long-term management, and specific legal mechanism for long-term preservation (e.g., holder of conservation easement or fee title). The Conservation Plan will be subject to review and approval by the CPUC in consultation with the CDFW. After approval, the Conservation Plan must be implemented in full. In cases where a federally or state-listed threatened or endangered species may be affected, the Conservation Plan will conform to applicable conditions under any CESA or federal ESA Incidental Take Permit, Biological Opinion, or other consultation documents. Where a Habitat Conservation Plan or similar conservation instrument is applicable, then participation in that plan may constitute compliance with this habitat compensation requirement.</p>		
Conflicts with Local Policies or Ordinances Protecting Trees	<p>MM B-13: Identify Trees Affected by Project. If operation of the Proposed Project requires tree trimming to the extent that would require a tree alteration or removal permit as a requirement of a local policy or ordinance protecting trees, SCE shall consult with the local agency and a local agency certified arborist consistent with CPUC General Order No. 131-D.</p>	Review identification of affected trees and consultation with applicable jurisdictions	

CULTURAL RESOURCES

Paleontological Resources	<p>MM C-7: Conduct Curation and Final Reporting. All significant fossils collected will be prepared in a properly equipped paleontology laboratory to a point ready for curation no more than 45 days after all fieldwork is completed. Preparation will include the careful removal of excess matrix from fossil materials and stabilizing and repairing specimens, as necessary. Following laboratory work, all fossils specimens will be identified to the lowest taxonomic level, cataloged, analyzed, and delivered to an accredited museum repository for permanent curation and storage. The cost of curation is assessed by the repository and is the responsibility of SCE.</p> <p>At the conclusion of laboratory work and museum curation of any discovered paleontological resources, a final report will be prepared and submitted to the CPUC describing the results of the paleontological resource monitoring efforts associated with the project. The report will include a summary of the field and laboratory methods, an overview of the project area geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. A copy of the report will also be submitted to the designated museum repository.</p>	Review report	
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Table 5C. Mitigation Monitoring Plan – Post-Construction Measures

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Status
HYDROLOGY AND WATER QUALITY			
Groundwater Supply	MM HYD-3: Dewater Construction Site As Needed. If groundwater is unexpectedly encountered during construction, operation, or decommissioning of the Project, dewatering activities shall be performed in compliance with the California Stormwater Quality Association (CASQA) Handbook for Construction or other similar guidelines, as approved by the Central Valley and/or Lahontan RWQCB, as applicable based on jurisdiction. The Applicant shall submit a written description of all executed dewatering activities, including steps taken to return encountered groundwater to the subsurface and/or to dispose of the dewatered groundwater upon the completion of dewatering activities at the affected site(s).	Review dewatering activities reports	