

# ALISO CANYON TURBINE REPLACEMENT PROJECT

## FINAL ENVIRONMENTAL IMPACT REPORT

JUNE 2013



Prepared for:



**State of California  
Public Utilities  
Commission**

Prepared by:



**ecology and environment, inc.**  
Global Environmental Specialists

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## Acronyms and Abbreviations

µg/m <sup>3</sup>	micrograms per cubic meter
AAI	All Appropriate Inquiry
AB	Assembly Bill
ACSR	Aluminum Conductor Steel Reinforced
af	acre feet
AMSL	above mean sea level
APE	Area of Potential Effect
APLIC	Avian Power Line Interaction Committee
APM	Applicant Proposed Measure
applicant	Southern California Gas Company
AQMP	air quality management plan
ATCS	Adaptive Traffic Control System
ATSAC	Automated Traffic Surveillance and Control
B.P.	before present
bgs	below ground surface
BMP	Best Management Practice
Btu/hp	British thermal units/horsepower
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAGN	coastal California gnatcatcher
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Occupational Health and Safety Administration
CalEMA	California Emergency Management Agency
CalEPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CBS	U.S. Chemical Safety and Hazard Investigation Board
CCAA	California Clean Air Act
CCAS	California Climate Adaptation Strategy
CCR	Code of California Regulations
CDC	California Department of Conservation
CDFG	California Department of Fish and Game
CDMG	California Division of Mines and Geology
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
cf	cubic feet
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH <sub>4</sub>	methane
CMA	Congestion Management Agency
CMP	Congestion Management Program
CMWD	Calleguas Municipal Water District
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society



CNRA	California Natural Resources Agency
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalency
CPCN	Certificate of Public Convenience and Necessity
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CSERP	Construction Safety and Emergency Response Plan
CUP	Conditional Use Permit
CUPA	Certified Uniform Program Agency
CWA	Clean Water Act
dB	decibels
dBA	A-weighted decibel
DHS	Department of Homeland Security
DOGGR	California Division of Oil, Gas, and Geothermal Resources
DOT	U.S. Department of Transportation
DTSC	Department of Toxic Substances Control
E & E	Ecology and Environment, Inc.
EDR	Environmental Data Resources
EIR	environmental impact report
EMF	Electric and magnetic fields
EPA	U.S. Environmental Protection Agency
ESA	Federal Endangered Species Act
F	Fahrenheit
FAA	Federal Aviation Administration
FC	candidate for listing under the Federal Endangered Species Act
FE	federally endangered
FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping and Monitoring Program
FP	fully protected under the Federal Endangered Species Act
FT	federally threatened
FTA	Federal Transportation Administration
g	fraction of the acceleration of gravity
GHG	greenhouse gas
GO	General Order
GWP	global warming potential
H <sub>2</sub> S	hydrogen sulfide
HCA	High Consequence Area
HCM	Highway Capacity Manual
HFC	hydrofluorocarbons
HMTA	Hazardous Materials Transportation Act
HSC	Health and Safety Code
HUC	Hydrologic Unit Code
I-210	Interstate 210
I-5	Interstate 5
ICU	Intersection Capacity Utilization
IPCC	Intergovernmental Panel on Climate Change
IS	initial study
ITP	Incidental Take Permit

IWMD	Ventura County Public Works, Water and Sanitation Department, Integrated Waste Management Division
kV	kilovolt
LACDPW	Los Angeles County Department of Public Works
LACDWP	Los Angeles County Department of Water and Power
LACFD	Los Angeles County Fire Department
LACM	Natural History Museum of Los Angeles County
LADOT	City of Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
LAFD	City of Los Angeles Fire Department
LAPD	City of Los Angeles Police Department
LARWQCB	Los Angeles Regional Water Quality Control Board
LASDPW	City of Los Angeles Sanitation Department of Public Works
LAUSD	Los Angeles Unified School District
$L_{dn}$	Day-Night Level
$L_{eq}$ (h)	hourly equivalent sound level
$L_{eq}$	sound level equivalent
$L_{max}$	maximum sound level
$L_{min}$	minimum sound level
LOS	level of service
LRA	Local Responsibility Area
LST	lattice steel tower
LST	localized significance threshold
LUFT	leaking underground fuel tank
LUST	leaking underground storage tank
LWS	lightweight steel (pole)
MBTA	Migratory Bird Treaty Act
MCE	maximum credible earthquake
MDA	Michael D. Antonovich
Metro	Metropolitan Transportation Authority
mg/L	milligrams per liter
MM	mitigation measure
MMP	Mitigation Monitoring Plan
mm/year	millimeters/year
MND	mitigated negative declaration
MP	Milepost
MPE	maximum probable earthquake
mph	miles per hour
MRZ	Mineral Resource Zone
MVA	megavolt ampere
$M_w$	maximum moment magnitude
MWA	megavolt ampere
$N_2O$	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NASA	National Aeronautics and Space Administration
NCWD	Newhall County Water District
NEC	National Electric Code
NFIP	National Flood Insurance Program
NFPA	National Fire Protection Association

NO <sub>2</sub>	Nitrogen dioxide
NOA	Notice of Availability
NOP	Notice of Preparation
NO <sub>x</sub>	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
NSD	Newhall School District
OIR	Order Instituting Rulemaking (CPUC)
OSHA	U.S. Occupational Health and Safety Administration
PCE	passenger car equivalency
PEA	Proponent's Environmental Assessment
PFC	perfluorocarbons
PG&E	Pacific Gas and Electric Company
PHA	Process Hazard Assessment
Plant Station	Aliso Canyon Plant Station
PM <sub>10</sub>	Particulate matter less than or equal to 10 microns in diameter
PM <sub>2.5</sub>	Particulate matter less than or equal to 2.5 microns in diameter
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
proposed project	Aliso Canyon Turbine Replacement Project
PSIA	Pipeline Safety Improvement Act
quad	quadrangle
R	Rare under the California Endangered Species Act
RCRA	Resource Conservation and Recovery Act
ROG	reactive organic gas
ROW	right-of-way
RTC	Regional Clean Air Incentive Market Trading Credit
RWQCB	Regional Water Quality Control Board
SA	Settlement Agreement
SARA	Superfund Amendment and Reauthorization Act
SCAB	South Coast Air Basin
SCADA	Supervisory Control and Data Acquisition
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SCH	State Clearinghouse
SCR	Selective Catalytic Reduction
SDG&E	San Diego Gas and Electric
SE	state endangered
SEA	Significant Ecological Area
SEATAC	Significant Ecological Areas Technical Advisory Committee
SEMS	Standardized Emergency Management System
SF <sub>6</sub>	sulfur hexafluoride
SIP	State Implementation Plan
SLIC	Spills–Leaks–Investigations–Cleanups
SMARA	California Surface Mining and Reclamation Act
SO <sub>2</sub>	sulfur dioxide
SoCalGas	Southern California Gas Company
SPCC	Spill Prevention Control and Countermeasure

SR	State Route
SRA	State Responsibility Areas
SSC	species of special concern in California
ST	state threatened
storage field	Aliso Canyon Natural Gas Storage Field
SWFL	southwestern willow flycatcher
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
T&E	threatened and endangered
TAC	toxic air contaminant
TDC	turbine-driven compressors
TIA	Traffic Impact Assessment
TMDL	Total Maximum Daily Load
TSP	tubular steel pole
U.S.C.	United States Code
UBC	Uniform Building Code
UNFCCC	United Nations Framework Convention on Climate Change
USACE	U.S. Army Corp of Engineers
USDA	United States Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
V/C	volume-to-capacity
VCFD	Ventura County Fire Department
VdB	decibels of vibration velocity
VOC	volatile organic compound
VRP	visibility-reducing particle
WP	wooden pole
WRP	Water Reclamation Plant
ZV	Zone Variance

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# 1. Introduction

## 1.1 Final EIR Context

The Aliso Canyon Turbine Replacement Project (the proposed project) has been proposed by Southern California Gas Company (SoCalGas, or applicant). On September 28, 2009, SoCalGas filed an application (A. 09-09-020) with the California Public Utilities Commission (CPUC) to amend its Certificate of Public Convenience and Necessity (CPCN) for the construction and operation of the proposed project, which is located in unincorporated and incorporated areas of Los Angeles and Ventura counties, California. A Notice of Availability for the Draft Environmental Impact Report (Draft EIR) for the proposed project was prepared and distributed for public review on April 4, 2012, by the CPUC, as the lead agency under the California Environmental Quality Act (CEQA).

This document, along with the Draft EIR, completes the Final EIR for the proposed project. The Final EIR addresses the environmental impacts of the proposed project and the approvals necessary for the project.

The construction of the proposed project would expand the Aliso Canyon Natural Gas Storage Field's (storage field's) natural gas injection capacity from approximately 300 million standard cubic feet (scf) per day to approximately 450 million scf per day. New and modified Southern California Edison (SCE) electric service facilities would be required to provide power for the proposed project; thus, the improvements that would be carried out by SCE are considered part of the proposed project and are subject to the same level of CEQA review as the other components of the proposed project. As part of the proposed project, the applicant would construct and operate the following project components at the storage field:

- Central Compressor Station with three new electric-driven, variable-speed compressors and pipelines to connect the station to existing facilities;
- 12-kilovolt (kV) Plant Power Line to supply the Central Compressor Station with power;
- Office and crew-shift buildings; and
- Guardhouse on a widened segment of the existing entry road into the storage field.

The applicant would decommission and remove the:

- Existing compressor station and its three gas turbine-driven compressors; and
- Existing main office and crew-shift buildings.

To provide power to the proposed electric-driven compressors, SCE would:

- Construct and operate a 56-megavolt-ampere (MVA), 66/12-kV substation (the Natural Substation) on the storage field site; and
- Reconductor and replace towers and poles along segments of SCE's Chatsworth-MacNeil-Newhall-San Fernando 66-kV Subtransmission Line and MacNeil-Newhall-San Fernando 66-kV Subtransmission Line in the proposed project area.

To allow for remote monitoring and operation of the proposed electrical facilities, SCE would:

- Install equipment at SCE's Newhall, Chatsworth, and San Fernando Substations in the proposed project area; and
- Install new fiber optic telecommunications cable in the proposed project area.

See Chapter 2, Project Description, of the Draft EIR for a complete description of the expansion.

This document has been prepared pursuant to the requirements of CEQA. Section 15132 of the CEQA Guidelines states:

“The Final EIR shall consist of:

- a. The draft EIR or a revision of the draft. [see Appendix A of this Final EIR]
- b. Comments and recommendations received on the draft EIR either verbatim or in summary. [see Chapter 3]
- c. A list of persons, organizations, and public agencies commenting on the draft EIR. [see Chapters 1 and 3]
- d. The responses of the Lead Agency to significant environmental points raised in the review and consultation process. [see Chapter 3]
- e. Any other information added by the Lead Agency.” [see Chapters 1, 2, 4, and 5, and appendices]

The Final EIR presents comments and responses not available in the Draft EIR. The findings and a statement of overriding considerations (if required) are included in the public record but not in the Final EIR.

## **1.2 Purpose of Final EIR**

The Final EIR has been prepared in compliance with CEQA, including the CEQA Guidelines (Title 14, California Code of Regulations, Chapter 3, Guidelines for Implementation of the California Environmental Quality Act), and guidance provided by the CPUC. The responses to comments contained in this document provide clarification on the content of the Draft EIR, including the project description, the assessment of impacts associated with the project, and mitigation measures that will address those impacts. The responses to comments address physical environmental impacts associated with the proposed project. Some of the comments received during the public review period for the Draft EIR address social or economic impacts that would not have a corresponding physical impact; consistent with CEQA (CEQA Guidelines Section 15131), these, and the response to comment of this nature is generally limited to a statement that the comment is included in the public record and will be taken into account by decision-makers when they consider the proposed project.

## **1.3 Comments on the Draft EIR**

The Draft EIR was submitted to the State Clearinghouse for distribution to state agencies; it was available to agencies and the public for review and comment for a 45-day period, starting April 4, 2012 and ending May 22, 2012. This period was extended by two weeks (to June 5) so that comments submitted to the CPUC after the 45-day period could be considered. The CPUC held two public meetings

in May 2012 to explain the proposed project, discuss the impacts expected to result from the project and the mitigation measures to address such impacts, and receive public comments on the Draft EIR.

Comments received on the Draft EIR included letters (including emails), oral comments made during the public meetings, and oral comments made on the CPUC's telephone hotline for the project. Comments were received from state, regional, and local agencies; organizations; and individuals. Oral comments made during the public meetings have been summarized and presented in Chapter 3, Responses to Comments. Each comment has been assigned a number. Comments are listed below by number and author.

### **Federal, State, Regional, and Local Agencies**

- A1. U.S. Fish and Wildlife Service
- A2. California Department of Fish and Game<sup>1</sup>
- A3. County of Los Angeles Fire Department
- A4. South Coast Air Quality Management District
- A5. City of Santa Clarita (May 14, 2013)
- A6. City of Santa Clarita (May 17, 2013)
- A7. Los Angeles County Department of Public Works
- A8. California Secretary of State, Business Programs Division

### **Individuals**

- B1. Frederick Senko
- B2. Kathy Hobbs
- B3. Steven Petto, representing AECOM
- B4. Craig Simon
- B5. Scott Rucker

### **Organizations**

- O1. Southern California Edison
- O2. Southern California Gas Company
- O3. Chatsworth Neighborhood Council, Land Use Committee
- O4. Santa Susana Mountain Park Association
- O5. Valencia Staff, KB Home

### **Oral Comments Made at Public Meetings and on the CPUC Hotline**

- P1. Craig Simon
- P2. Teena Takata

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<sup>1</sup> As of January 1, 2013, the California Department of Fish and Game is now known as the California Department of Fish and Wildlife.

- P3. Dave Hassan
- P4. Dick Rippey
- P5. Scott Rucker
- P6. Michelle Rucker
- P7. Scott Rucker (CPUC hotline)

## 1.4 Organization and Contents of the Final EIR

This document contains five chapters and five appendices, as described below. The Final EIR consists of two volumes. Volume I of the Final EIR is the Draft EIR, which was previously distributed and is available upon request; Volume II of the Final EIR is this document, which includes changes to the Draft EIR, and responses to comments on the Draft EIR. Volumes I and II constitute the Final EIR submitted to the CPUC for certification.

**Chapter 1** introduces the Final EIR, summarizing the project and listing comment letters received during the public review period.

**Chapter 2** summarizes the public review process pursuant to CEQA.

**Chapter 3** lists agencies, organizations, and members of the public that commented on the Draft EIR; comments received during the Draft EIR public review process; and responses to these comments. Comment letters are reproduced in full in this section, and are numbered according to the list described earlier. Comments within each letter are numbered sequentially.

**Chapter 4** presents a synopsis of the project and environmental impacts.

**Chapter 5** presents the revised Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) from Chapter 5 of the Draft EIR. All changes to mitigation measures are shown in strikeout and underline format.

**Appendix A** presents changes made to the Draft EIR text, tables, and figures as a result of comments and responses. Because changes to the Draft EIR, though not extensive in terms of substance, are nonetheless extensive in number throughout the Draft EIR, this volume of the Final EIR reproduces the entire Draft EIR.

**Appendix B** presents revised calculations of the air quality emissions that were presented in the Draft EIR, in response to comments from SoCalGas and SCE.

**Appendix C** presents supplemental information provided by SoCalGas and SCE that addresses biological resources; geology, soils, and mineral resources; and noise.

**Appendix D** presents the Notice of Completion and Environmental Document Transmittal for the Draft EIR.

**Appendix E** summarizes the Draft EIR public meetings conducted May 2 and 3, 2012, including oral comments.

## 1.5 Decision-Making Process

Pursuant to Article XII of the Constitution of the State of California, the CPUC oversees the regulation of investor-owned public utilities, including those of the applicant. The CPUC is the lead state agency ensuring compliance of the project with CEQA regulations. This Final EIR will be used by the CPUC, in conjunction with other information developed in the CPUC's formal record, to act on the applicant's application to amend its CPCN. The CPUC will determine whether this Final EIR is adequate, and, if it does, will certify the document as complying with CEQA. If the project is approved, the CPUC will be required to adopt CEQA findings and the MMCRP to ensure that the mitigation measures identified in the Final EIR will be implemented. Consistent with CEQA Guidelines Section 15097, the MMCRP is a program designed to ensure that the mitigation measures identified in the Final EIR and adopted by the CPUC are implemented.

The Final EIR is also an informational document that may be used by other responsible and trustee government agencies and the public to aid the planning and decision-making process by disclosing the physical effects of the project and identifying measures and actions that would reduce or avoid any significant impacts.



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## **2. Summary of Public Review Process**

### **2.1 Notice of Preparation and Public Scoping**

On October 21, 2010 the California Public Utilities Commission (CPUC) issued a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) to the State Clearinghouse, beginning the California Environmental Quality Act (CEQA) environmental review process for the Aliso Canyon Turbine Replacement Project (proposed project). On October 26, 2010, the CPUC subsequently mailed an errata notice for the NOP to inform the public that the November 5, 2010 meeting had an address correction and would be held at the Wiley Canyon Elementary School located in Newhall, California. Pursuant to CEQA Section 15082, the NOP summarized the proposed project, stated the CPUC's intention to prepare an EIR, and requested comments from public agencies and interested parties on the scope of the EIR.

Issuance of the NOP initiated the 30-day public scoping period, which ended on November 22, 2010. Public notification of the NOP included direct mail and the CPUC's website for the proposed project. The CPUC mailed a notification of the scoping period to federal, state, regional, and local agencies; elected officials; and public stakeholders, including property owners within 300 feet of the proposed project.

The CPUC received 14 written comments on the proposed project during the scoping period. These letters were included in Appendix B of the Draft EIR.

### **2.2 Notice of Availability of the Draft EIR and Public Review**

The Draft EIR and its Notice of Availability (NOA) were issued on April 4, 2012, to the State Clearinghouse (SCH# 2010062025); it was available to agencies and the public for review and comment for a 45-day period, starting April 4, 2012 and ending May 22, 2012. This period was extended by two weeks (to June 5) so that comments submitted to the CPUC after the 45-day period could be considered. The Draft EIR and NOA were mailed to public agencies and interested parties. The NOA included a description of the proposed project; a summary of key environmental issues discussed in the Draft EIR; the date, times, and locations of two public meetings for the Draft EIR; and instructions for commenting on the Draft EIR.

The Draft EIR included a detailed project description; a description of project alternatives; a description of the environment setting; an evaluation of the environmental impacts of the project and alternatives; and mitigation measures to avoid or reduce environmental impacts.

Electronic copies on CD-ROM of the Draft EIR were distributed to interested parties, agencies, and the State Clearinghouse. Hard copies were distributed to two local libraries. The Draft EIR was also uploaded to the website for the proposed project.

#### **2.2.1 Newspaper Notification**

The CPUC placed notices announcing the availability of the Draft EIR, and the times and locations of the Draft EIR public meetings, in the *Santa Clarita Valley Signal*, *Los Angeles Daily News*, and *Ventura County Star* on April 4, 2012.

## 2.2.2 Information and Repository Sites

Three repository sites were established to facilitate public review of documents related to the proposed project, including the Draft EIR and the Final EIR. The document repository sites were:

**San Fernando Library**  
217 North Maclay Avenue  
San Fernando, CA 91340  
(818) 365-6928

**Newhall Library**  
22704 W. Ninth Street  
Santa Clarita, CA 91321  
(661) 259-0750

**Simi Valley Library**  
2969 Tapo Canyon Road  
Simi Valley, CA 93063  
(805) 526-1735

In addition, copies of documents related to the proposed project, including the Draft and Final EIR, are available on the CPUC's website for the proposed project (see website address, below).

## 2.2.3 Public Comment on the Draft EIR

The CPUC accepted comments on the Draft EIR during the public review period (April 4 through June 5, 2012) by mail, email, fax, and voicemail. The following contact information was provided in the NOA, newspaper announcements, and Draft EIR; at the Draft EIR public meeting; and on the CPUC's website for the Aliso Canyon Turbine Replacement Project:

**Email:** [AlisoCanyonNG@ene.com](mailto:AlisoCanyonNG@ene.com)

**Fax:** 415-398-5326

**Voicemail:** 877-676-8678 (toll free)

**Website:** [www.cpuc.ca.gov/Environment/info/ene/aliso\\_canyon/aliso\\_canyon\\_home.html](http://www.cpuc.ca.gov/Environment/info/ene/aliso_canyon/aliso_canyon_home.html)

## 2.2.4 Draft EIR Public Meetings

Two public meetings were held on the Draft EIR—on May 2, 2012 at Wiley Canyon Elementary School in the community of Newhall and on May 3, 2012 at the Porter Valley Country Club in the City of Northridge (see Table 2-1). These meetings consisted of a short presentation (on the CPUC permitting process, the proposed project, the CEQA review process, and the findings of the Draft EIR), followed by opportunities for members of the public, organizations, and agencies to provide oral comments on the Draft EIR. All oral comments provided at the public meetings were summarized and are included in Appendix E of this Final EIR. Approximately 20 members of the public and representatives from organizations and government agencies attended the meetings.

Table 2-1 Times, Dates, and Locations of Aliso Canyon Turbine Replacement Draft EIR Public Meetings

Time	Date	Location
6:30 to 9:00 p.m.	Wednesday, May 2, 2012	Wiley Canyon Elementary School, 24240 La Gloria Circle, Newhall, CA 91321
6:30 to 9:00 p.m.	Thursday, May 3, 2012	Porter Valley Country Club, 19216 Singing Hills Drive, Northridge, CA 91326

## 3. Response to Comments

### 3.1 Introduction

This chapter documents the comments on the Draft Environmental Impact Report (Draft EIR) that were submitted by agencies, individuals, and organizations during the public review period (April 4 through June 5, 2012). Comments could be submitted by letter, fax, email, voicemail, or orally at public meetings. All of the comments received and the responses to those comments are presented in Section 3.3. A list of all commenters is provided in Section 3.2. A total of 17 letters were received, containing a total of 417 comments; 95 oral comments were made at the two public meetings for the Draft EIR; and one voicemail message containing six comments was submitted via the CPUC's telephone hotline for the project.

### 3.2 List of Comment Letters Received

The comment letters received on the Draft EIR are grouped below and given letter designations (A for agency, B for individual, O for organization, and P for oral comments made at public meetings and on the CPUC hotline), and each of the comments from the letters are assigned a number. The commenters and letter designations are listed below.

#### **Federal, State, Regional, and Local Agencies**

- A1. U.S. Fish and Wildlife Service
- A2. California Department of Fish and Game<sup>1</sup>
- A3. County of Los Angeles Fire Department
- A4. South Coast Air Quality Management District
- A5. City of Santa Clarita (May 14, 2013)
- A6. City of Santa Clarita (May 17, 2013)
- A7. Los Angeles County Department of Public Works
- A8. California Secretary of State, Business Programs Division

#### **Individuals**

- B1. Frederick Senko
- B2. Kathy Hobbs
- B3. Steven Petto, representing AECOM
- B4. Craig Simon
- B5. Scott Rucker

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<sup>1</sup> As of January 1, 2013, the California Department of Fish and Game is now known as the California Department of Fish and Wildlife.

## **Organizations**

- O1. Southern California Edison
- O2. Southern California Gas Company
- O3. Chatsworth Neighborhood Council, Land Use Committee
- O4. Santa Susana Mountain Park Association
- O5. Valencia Staff, KB Home

## **Oral Comments Made at Public Meetings and on the CPUC Hotline**

- P1. Craig Simon
- P2. Teena Takata
- P3. Dave Hassan
- P4. Dick Rippey
- P5. Scott Rucker
- P6. Michelle Rucker
- P7. Scott Rucker (CPUC hotline)

## **3.3 Responses to Comments**

This section presents responses to issues raised in comments received on the Draft EIR during the review period related to environmental effects of the proposed project. The California Environmental Quality Act (CEQA) Guidelines indicate that a Final EIR should address comments on the Draft EIR. Comments that state opinions about the overall merit of the project are included in the CPUC's public record and will be taken into account by decision-makers (CPUC Commission) when they consider the proposed project, but are generally not responded to unless a specific environmental issue is also raised.

Each letter received is reproduced here in its entirety. Responses are identified based on the system described above and are provided for each comment; the comment numbers are shown within each letter. Changes to the Draft EIR are referenced in the response. Added text is underlined; deleted text is stricken.

### **3.3.1 Master Responses to Comments**

Master responses in this section address general subjects not necessarily related to a specific section of the EIR, and in some cases address a number of interrelated topics discussed in various sections of the EIR. Master responses include:

- **Master Response to Comments About Fire Safety**
- **Master Response to Comments About Telecommunications Route #4 and Routing Alternative A**
- **Master Response to Comments About Underground Alternatives**
- **Master Response to Comments About the Environmentally Superior Alternative**



- **Master Response to Comments About CEQA Significance Determinations (No Impact Versus Less Than Significant Impact)**

Responses to individual comments presented after these master responses refer back to these discussions as appropriate.

### **Master Response to Comments About Fire Safety**

Comments on the Draft EIR addressed the history of fires in the project region, the proximity of residential development to the Aliso Canyon Natural Gas Storage field (storage field), the fire safety procedures used during current and past operations at the storage field facility, and whether additional fire risk analysis for the project should be conducted. Section 4.8, “Hazards and Hazardous Materials” was revised to include additional information about existing regulations, plans, and procedures addressing fire safety, including the following:

- A description of the CPUC’s Order Instituting Rulemaking (OIR) to Revise and Clarify Commission Regulations Relating to the Safety of Electric Utility and Communications Infrastructure Provider Facilities (Electric Safety OIR, Phase 1/Phase 2/Phase 3 decisions, R.08-11-005) and changes to the applicant’s fire safety procedures and policies since the initiation of the Electric Safety OIR;
- Further description of brush clearance activities, including agencies responsible for ensuring compliance and the applicant’s brush clearance procedures and practices;
- Additional information regarding the applicant’s maintenance and inspection of the existing storage field facility electric distribution system and fire safety improvements to the storage field facility electric distribution system that have taken place since 2008;
- Information regarding fire inspections that have taken place in the past five years on the storage field facility site and the SCE right-of-way (ROW);
- Information regarding a recent, 2012 fire that was reported and put out on the storage field facility site; and
- Standards, procedures, regulations, and guidance that would guide local fire agency review of the applicant’s and SCE’s fire safety materials.

Additional issues related to fire safety raised by commenters are also discussed here.

### ***Proximity of Residential Development to Aliso Canyon Natural Gas Storage Field Facility***

Several comments addressed whether the storage field facility could be moved to an area or region with less, or less dense, adjacent residential development. The storage field facility injects and withdraws natural gas into and from an underground rock formation that has been used for gas extraction since 1972. The rock formation is immovable and uniquely suited for natural gas storage. The growth of residential areas in Northridge, Porter Ranch, and other communities adjacent to the storage field facility property is regulated by City of Los Angeles and County of Los Angeles general plans and zoning ordinances, and not the CPUC; much of this growth has taken place since existing natural gas storage operations began in 1993, and most of the development of residential areas adjacent to the storage field facility property has taken place since the field was first used for gas extraction in 1972.

Although the growth of residential development adjacent to the storage field facility property is not regulated by the CPUC, the CPUC does regulate operation of the facility to ensure safety. As discussed in Section 4.8, “Hazards and Hazardous Materials,” the storage field facility’s existing record of safe natural gas operations is excellent. Since the 1970s, two safety incidents occurred at the storage field, neither of which resulted in injuries, loss of life, or major equipment damage. Potential fires at adjacent residential development that could originate on the storage field facility property are addressed in Section 4.8, and, with mitigation, the risk of these types of hazards would be reduced to a less than significant level. The storage field facility’s proximity to dense urban residential development therefore does not represent significant risks to those communities.

### ***Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Facility***

Several comments addressed current and past fire safety procedures, plans, and policies in place at the storage field facility, as well as whether additional fire-fighting equipment and facilities (e.g., helicopters) should be established at the storage field facility. These comments are most appropriately addressed as part of the parallel process of project application review conducted by the CPUC’s assigned Administrative Law Judge. The EIR does not address compliance with existing laws and regulations; enforcement of compliance with such laws is not evaluated under CEQA.<sup>2</sup> Pursuant to the Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge dated October 16, 2012 for the project application, the applicant was required to serve prepared testimony to address the following issue:

*“Are the rules adopted in R.08-11-005 adequate to ensure the safe operation of the Facility? Should requirements (in addition to any mitigation measures that may be recommended in the EIR) be imposed on any CPCN that may be granted in order to improve the safety of the Facility’s operations and to reduce existing fire risks?”*

The applicant’s testimony dated November 16, 2012 addressing this issue presents a response to comments on the Draft EIR related to current and past fire safety procedures, plans, and policies in place at the storage field facility.

The applicant has confirmed that the Southern California Gas Company employs staff at the storage field with expertise in electrical systems in general and Aliso Canyon’s overhead electrical system specifically and that these staff follow the guidance included in CAL FIRE’s *Power Line Fire Prevention Field Guide* (2008) with regard to the fire safety of these systems (Schwecke 2013). These employees are responsible for ensuring compliance with CPUC General Orders 95, 165, and 128, with regard to inspections of power lines and brush clearance, and are supported by San Diego Gas & Electric (SDG&E) personnel, who act in a consulting capacity to staff at the storage field facility and perform quality assurance review of the fire safety of electrical infrastructure at the facility (Schwecke 2013). SCE also employs staff trained in fire safety procedures for electrical systems. Although the applicant and SCE employ professionals who are trained to respond to fire and emergency situations, the primary responsibility for preventing and fighting fires in the project area lies with local fire service agencies, who maintain expertise and equipment specific to fighting fires in the region.

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<sup>2</sup> Per Remy, Thomas, Moose, and Manley (2007 *Guide to CEQA, California Environmental Quality Act*, pp. 202-203), regarding *Riverwatch v. County of San Diego* (4<sup>th</sup> Dist. 1999) 76 Cal. App. 4<sup>th</sup> 1428 [91 Cal. Rptr 2d 322]: “Recognizing the practical difficulties associated with combining environmental review with enforcement, the court found that the responsibility for determining the nature and consequences of alleged prior illegality rests with the agencies charged with direct enforcement duties.”

### ***Additional Fire Risk Analysis for the Proposed Project***

As discussed in Section 4.8, “Hazards and Hazardous Materials,” as revised and presented in Appendix A of this Final EIR, the existing risk of fire hazards is, for many parts of the project area, very high. This very high risk is identified as part of baseline conditions. The incremental increase in risk of fire and damage or loss due to fire from construction or operation of the proposed project has been measured against this baseline, as part of the EIR assessment of impacts. The EIR concludes that, although the incremental increase in fire risk from the project is minor, the existing very high risk of fire in the project area is such that mitigation measures addressing project construction and operation are warranted. Inherent in this qualitative, yet nonetheless conservative, approach to assessing project fire risks is the assumption that any fire originating in the project area could threaten the safety of adjacent residential areas. Additional analysis assessing the risk of fire in the project area could quantify the risk, but the mitigation measures have been designed with the assumption of a very high risk already. Therefore, no additional fire risk analysis is warranted.

### **References**

Schwecke, Roger. 2013. Southern California Gas Company Director – Storage. Personal communication with Andrew Barnsdale and Christy Herron, CPUC. January 23.

### **Master Response to Comments About Telecommunications Route #4 and Routing Alternative A**

The Draft EIR described three fiber optic cable routes proposed by SCE that would be part of the proposed project: Telecommunications Routes #1, #2, and #3 (refer to Draft EIR Figure 2-1). After circulation of the Draft EIR, SCE commented that an additional telecommunications line (Telecommunications Route #4; shown on EIR Figures 2-1 and 2-8 as revised and presented in Appendix A of the Final EIR) would be required for the proposed Natural Substation and the proposed and existing 66-kV facilities to which it would connect, resulting in a minor change in the project description.

SCE is able to remotely monitor and operate electrical facilities through a telecommunications system composed of fiber optic cables connecting the facilities to staffed operations centers. To ensure that telecommunications systems maintain continuous communication with each of SCE’s electrical facilities, redundant fiber optic lines are needed that are constructed on separate routes that are sufficiently distant from one another, to guarantee that if an incident occurs along one route that removes that fiber optic line from service, a second (redundant) fiber optic line remains in service. Telecommunications Route #4 was added to provide the requisite redundancy (refer to EIR Section 2.2.9, “Telecommunications Routes,” as revised and presented in Appendix A of the Final EIR).

Because Telecommunications Route #4 would overlap with Routing Alternative A (refer to EIR Figure 3-1, as revised and presented in Appendix A of the Final EIR), Routing Alternative A has been removed from EIR Chapter 5, “Comparison of Alternatives” (as revised and presented in Appendix A of the Final EIR). Routing Alternative A was an alternative to Telecommunications Route #3. However, because the routes of Telecommunications Route #4 and Routing Alternative A are so similar, Routing Alternative A can no longer be considered an alternative to Telecommunications Route #3. In addition, if both Telecommunications Route #4 and Routing Alternative A were built, they would not fulfill the purpose and need of providing redundancy. Further information is provided in EIR Section 3.3.2, “Routing Alternative A (Telecommunications: Sylmar Substation to San Fernando Substation),” as revised and presented in Appendix A of the Final EIR.

Telecommunications Route #4 (approximately 5.6-miles long) is very similar to Routing Alternative A (approximately 5.1-miles long) except for an approximately 0.8-mile-long segment that would extend overhead along San Fernando Road from the intersection of San Fernando Road and Sepulveda Boulevard north to the entrance of Sunshine Canyon Landfill. Routing Alternative A would, instead, extend south from the intersection of San Fernando Road and Sepulveda Boulevard to Sylmar Substation; the length of this segment would depend on the location of the fiber optic connection point used at the substation. Chapter 4 of the Final EIR contains the environmental analysis for the approximately 0.5-miles of additional fiber optic cable of Telecommunications Route #4. The analysis of the route did not identify any significant impacts associated with Telecommunications Route #4 that were not otherwise addressed by mitigation proposed in the Draft EIR.

The CEQA Guidelines clarify that “An EIR need not consider every conceivable alternative to a project. Rather it must consider a *reasonable range* of potentially feasible alternatives that will foster informed decision making and public participation” (CEQA Guidelines Section 15126.6; emphasis added). Eleven alternatives – eight of which were originally presented by the applicant in the Proponent’s Environmental Assessment (PEA), and three of which were formulated by the CPUC – were initially reviewed; all but three of these alternatives were “screened out” of the EIR analysis because they either did not meet the objectives of the project, were not potentially feasible, or would not have avoided or substantially lessened a significant project impact (as discussed in the Alternatives Screening Report, which is Appendix C of the Draft EIR). The Draft EIR included three alternatives – the Design Alternative, Routing Alternative A, and the No Project Alternative (EIR Chapter 3.0, “Description of Alternatives”) – that were retained for evaluation (EIR Chapter 5.0, “Comparison of Alternatives”). Although Routing Alternative A, at the request of SCE, has been removed from the analysis of alternatives in the EIR, the two remaining alternatives – the Design and No Project alternatives – represent a reasonable number of alternatives to inform decision-making, given the limitations placed on the project objectives by the Settlement Agreement (which requires that the applicant increase the overall injection capacity at the field by approximately 145 million standard cubic feet of natural gas per day, as discussed in EIR Chapter 1.0, “Introduction”),<sup>3</sup> and given that the EIR does not identify any significant and unavoidable impacts from the proposed project.

### **Master Response to Comments About Underground Alternatives**

Some comments on the Draft EIR addressed whether the CPUC should consider requiring the applicant and SCE to install the proposed 12-kV Plant Power Line and reconductored 66-kV subtransmission lines underground to reduce fire risk within very high fire hazard risk areas traversed by and in proximity to components of the proposed project.

The Draft EIR analysis (refer to EIR Section 4.8.1.3) concluded that the 12-kV Plant Power Line and reconductored 66-kV subtransmission lines as proposed (located on aboveground structures) would not result in a significant impact with regard to increased wildland fire risk with the implementation of measures to minimize these risks. The double-circuit 66-kV subtransmission lines would be constructed within existing overhead subtransmission line ROW, replacing older single-circuit 66-kV subtransmission line structures with new 66-kV subtransmission structures. New tubular steel poles (TSPs) would replace structures (wooden and steel poles, lattice steel towers, and H-frame supports) that are as much as 80 to 90 years old (Draft EIR p. 4.5-14). The new TSPs, and new conductors and

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<sup>3</sup> Per Remy, Thomas, Moose, and Manley (2007 *Guide to CEQA, California Environmental Quality Act*), “A very narrow range of alternatives might also be excused where, due to statutory or other legal constraints, a lead agency simply does not have a ‘reasonable range’ of options as to how to satisfy a legal duty.”

insulators on these structures, would be less likely to fail, fall, or otherwise ignite vegetation, and therefore represent a lower fire risk than the existing structures in SCE's ROWs within the project area. Three new TSPs would be installed to support the 12-kV Plant Power Line. Although these three TSPs would represent three new ignition sources within the storage field site, these structures would likewise be new, and would represent only a minor increase in fire hazard risk in the project area.

Mitigation Measure HZ-3 (refer to Section 4.8, "Hazards and Hazardous Materials," as revised and presented in Appendix A of the Final EIR) specifies that the applicant and SCE will coordinate with local fire departments and submit for review the applicant's Fire/Emergency Action Plan, SCE's Fire Management Plan, the applicant's and SCE's Construction Safety and Emergency Response Plans, and measures that would be undertaken by the applicant and SCE to further address risks involving wildland fires during construction and operation of the proposed project. Local fire agency staff would review these "fire management information" materials for adequacy with regard to the proposed project prior to project construction and consistent with codes, regulations, ordinances and other policy that would guide this review, including (Todd 2013):

1. The County of Los Angeles Fire Code (2011), including permits as required under Chapter 1, Section 105; Chapter 3, Section 325 (Clearance of Brush and Vegetative Growth); Chapter 4 (including Section 404.3.2, Fire Safety Plans, and 408.7.5, Emergency Plan); Chapter 14 (addresses fire safety during construction and demolition); and Chapter 34, Section 3406.3 (permits for well drilling and operation);
2. The County of Los Angeles Building Code (2011), which would apply to buildings within the project area that would require plan review from the County of Los Angeles Fire Department; and
3. CAL FIRE's *Power Line Fire Prevention Field Guide* (2008).

Additionally, the Draft EIR includes a discussion of California Public Resources Code Sections 4292 and 4293 and CPUC General Orders 95, 165, and 166, which apply to how the proposed power line and subtransmission lines would be constructed and maintained, including during periods of extreme weather events that increase fire risk. Consistent with these and other applicable federal and state laws, SCE would maintain an area of cleared brush around energized electrical equipment associated with the 66-kV subtransmission line (Draft EIR pages 4.8-40 to 4.8-42). Because the 66-kV subtransmission line project component represents a reduction in the existing risk of fire in SCE's ROW, and because installing the line underground instead would represent a greater level of environmental impact than would be associated with the much larger area of ground disturbance required by such an alternative, the CPUC did not consider an option whereby the 66-kV subtransmission lines would be undergrounded in the analysis of alternatives in the EIR.

Installation of the proposed 12-kV Plant Power Line in an underground conduit was considered as an alternative for this project component (Draft EIR p. 3-5 and Appendix C, "Alternatives Screening Report"). The Draft EIR analysis concluded, however, that effects on air quality and biological resources (coastal California gnatcatcher critical habitat) would be greater for such an alternative because of the increased disturbance area that would be required for construction. At least 1,200 feet of trenching would be required in a rocky, relatively undisturbed area with a very steep slope, requiring blasting, excavation, and the installation of new access roads (Sasadeusz 2013, SoCalGas 2009). In addition, retaining walls would be required to control erosion. The route for the Plant Power Line would traverse heavily sloped terrain that would need to be maintained at a 15 percent slope for the underground installation. All-weather access to the manholes that would be installed would be required, which would further require

additional access roadways and working space in comparison to the proposed overhead installation of the Plant Power Line (SoCalGas 2011). The CPUC therefore concluded that underground installation of this project component would not avoid or reduce a potentially significant impact, and this alternative was not evaluated further.

## References

CAL FIRE (California Department of Forestry and Fire Protection). 2008. Power Line Fire Prevention Field Guide.

Sasadeusz, Larry. 2013. Engineer. Southern California Gas Company. Personal communication with Christy Herron, Ecology and Environment, Inc., San Francisco, CA. February 7.

SoCalGas (Southern California Gas Company). 2011. Responses to data gap requests from the California Public Utilities Commission about the Proponent's Environmental Assessment for the Aliso Canyon Turbine Replacement Project from 2010–2011.

\_\_\_\_\_. 2009. Proponent's Environmental Assessment for the Aliso Canyon Turbine Replacement Project. September.

Todd, John. 2013. Chief. Los Angeles County Fire Department. Personal communication with Christy Herron, Ecology and Environment, Inc., San Francisco, CA. March 29.

## Master Response to Comments About the Environmentally Superior Alternative

Some comments addressed the methodology supporting the selection of the Environmentally Superior Alternative, and specifically maintained that the stated “degree” of “environmental superiority” of this alternative was insufficient. The discussion presented in Section 5.3, “Environmentally Superior Alternative,” focuses on impacts that would be significant without mitigation. Section 5.2.1, Design Alternative (Alternate Compressor Drive Type, a Non-wires Alternative) also provides discussions regarding aesthetics; agriculture and forestry resources; geology, soils, and mineral resources; hydrology and water quality; land use and planning; public services and utilities; recreation; and transportation and traffic. Under the heading, “Other Resource Areas,” in Section 5.3, the EIR concluded that the Design Alternative, like the proposed project, would not have a significant impact on any of the resource areas listed above. The EIR further concluded that although impacts to these resource areas would be less than significant without mitigation for both the proposed project and the Design Alternative, impacts from the Design Alternative would be less or lower for these resource areas than from the proposed project because impacts from the proposed electrical and telecommunications facilities associated with the proposed project would be avoided or reduced.

Impacts from the proposed electrical and telecommunications facilities project components on these resource areas would occur over a substantially larger area and closer to busy roadways and residential communities than impacts from the gas turbine–driven compressors and associated infrastructure that would be installed under the Design Alternative. For example, temporary construction impacts on sensitive visual receptors located near 66-kV Subtransmission Line Segments A and B, and on the visual character of communities through which the segments would traverse, would be avoided under this alternative (EIR Section 4.1, “Aesthetics”). Impacts on each of the other resources areas noted in the comments are also addressed under the heading, “Other Resource Areas,” in Section 5.3 of the EIR. The EIR discusses effects on population with regard to growth inducement (EIR page 5-9). These resource areas, however, were not selected as the primary criteria for selection of the Environmentally Superior

Alternative because impacts under these resources areas would be less than significant without mitigation for both the proposed project and Design Alternative. Further discussion regarding comments about CEQA significance determinations is presented in Master Response to Comments About CEQA Significance Determinations (No Impact Versus Less Than Significant Impact).

Alternatives to the proposed project were carried forward for analysis in the EIR from the alternatives screening analysis only if they were determined to meet most of the basic project objectives, be potentially feasible, and avoid or substantially reduce a significant impact of the proposed project (EIR Chapter 3.0, "Description of Alternatives," Section 3.1; CEQA Guidelines Section 15126.6). The proposed project was not determined to have significant impacts on aesthetics; agriculture and forestry resources; geology, soils, and mineral resources; hydrology and water quality; land use and planning; population and housing; public services and utilities; recreation; or transportation and traffic. The EIR concluded that the proposed project would result in significant impacts that require mitigation to reduce impacts to less than significant levels on the following five resource areas: air quality; biological resources; cultural and paleontological resources; hazards and hazardous materials; and noise (EIR page Table 5-1 in Chapter 5.0, "Comparison of Alternatives"). The qualitative analysis presented in Chapter 5 of the EIR, which focuses on these five resource areas in Section 5.3, determines that the proposed project would be the Environmentally Superior Alternative. Also refer to Master Response to Comments About Telecommunications Route #4 and Routing Alternative A.

### **Master Response to Comments About CEQA Significance Determinations (No Impact Versus Less Than Significant Impact)**

Some comments addressed the methodology for determining significance of environmental impact, specifically the difference between a determination of "less than significant" versus "no impact."

The Draft EIR identified a number of resource areas for which impacts would be less than significant during construction and operation of the proposed project. For these areas, evidence did not support the determination that there would be no impact on the resource area, or, in other words, that impacts on the resource area would "simply not apply" (CEQA Guidelines Appendix G) to the proposed project. For example, the analysis in Section 4.14, "Recreation," of the Draft EIR addressed whether the proposed project would directly or indirectly increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of such facilities would occur or be accelerated. The Draft EIR reasoned that an increase in recreational facility use would only occur if construction workers were required to relocate to the project area during construction. Although no construction workers are anticipated to be required to relocate to the area for construction of the project, the applicant has indicated that the relocation of some workers that do not live in the project area could be necessary. In the event that the applicant or SCE employ non-local workers for project construction, and these workers were to relocate to the project area, this relocation would likely be temporary.

A number of recreational facilities are present in the proposed project area (Table 4.14-1 in EIR Section 4.14, "Recreation"), and the maximum number of workers that would be required for the proposed project would, by comparison, be small. The analysis in the EIR includes the conservative estimate that in the unlikely event all components of the proposed project were under construction at the same time, up to 232 workers per day could be required (Table 2-5 in EIR Chapter 2.0, "Project Description"). The Draft EIR further concluded that impacts regarding population-growth inducement would be less than significant (EIR Section 4.12, "Population and Housing"). Therefore, it was determined that impacts on recreational resources, were they to occur, would be less than significant. The analysis presented in the Draft EIR indicates that it is not reasonable to assume that the significance criterion "Increase the use of

existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated” (Draft EIR Section 4.14.3, “Methodology and Significance Criteria”), simply does not apply to the proposed project; this would be the case only if zero construction workers would have the potential to visit parks or recreational facilities. Rather than no impact whatsoever, these workers could visit local parks, which could result in an impact, albeit one that is likely to be minor. Therefore, the “less than significant” determination was made for this impact, and no mitigation was required.

### **3.3.1 Comments Made by Federal, State, Regional, and Local Agencies**

This section provides responses to comments about the Draft EIR received from federal, state, regional, and local agencies and their representatives.



**A1 Jeff Phillips, Deputy Assistant Field Supervisor, South Coast Division, U.S. Fish and Wildlife Service, Ventura Field Office, 4/09/2012**

Letter A1

**From:** Jeff\_Phillips@fws.gov  
**Sent:** Monday, April 09, 2012 1:14 PM  
**To:** Herron, Christy  
**Cc:** Yolanda\_Ledesma@fws.gov  
**Subject:** Turbine Replacement Project

To Whom it May Concern,

The U.S. Fish and Wildlife Service Ventura, CA field office has received the Draft Environmental Impact Report for the above-referenced project. The EIR recognizes likely impacts to federally listed threatened and/or endangered species and the habitats upon which they depend. Section 2.6, page 2-62 identifies that a Section 7 or Section 10 of the Federal Endangered Species Act permit for incidental take of listed species will likely be required. We agree that the proposed project may have adverse impacts upon listed species and/or their supporting habitat, but because we are anticipating further coordination from the project proponent, we are not formally commenting on the draft EIR at this time.

A1-1

Sincerely,  
Jeff

Jeff Phillips  
Deputy Assistant Field Supervisor, South Coast Division  
U.S. Fish and Wildlife Service, Ventura Field Office  
2493 Portola Road, Suite B  
Ventura, CA 93003  
(805) 644-1766 x 285

The U.S. Fish and Wildlife Service's mission is, working with others, to conserve, protect and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people.

Click [here](#) to report this email as spam.

**A1     Jeff Phillips, Deputy Assistant Field Supervisor, South Coast Division, U.S. Fish and Wildlife Service, Ventura Field Office, 4/09/2012**

**A1-1:**     Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project.

**A2 Daniel Blankenship, Staff Environmental Scientist, California Department of Fish and Game, 5/21/2012**

Letter A2

**From:** Daniel Blankenship <DSBlankenship@dfg.ca.gov>  
**Sent:** Monday, May 21, 2012 1:06 PM  
**To:** Herron, Christy  
**Cc:** Siu, Jennifer D.  
**Subject:** Re: Aliso Canyon - Draft EIR discussion and comments SCH 2010101075

The Department has been included in early coordination along with the U.S. Fish and Wildlife Service regarding potential biological impacts related to project implementation. The Department appreciates the early coordination efforts with Ecology and Environment, Inc. Staff to fully evaluate potential biological impacts within the project footprint and habitats adjacent to the project. The Department concurs with the proposed biological mitigation measures and would like to recommend the development of a formal Nesting Bird Management Plan (NBMP). This NBMP should be developed in concert with the USFWS approximately 6 months prior to project implementation. Please contact Dan Blankenship well in advance to schedule staff time to help develop and comment on the NBMP. Thank you for the opportunity to review and comment on this DEIR

A2-1

Daniel S. Blankenship  
Staff Environmental Scientist  
CA Department of Fish and Game  
P.O. Box 802619  
Santa Clarita, CA 91380-2619  
phone/fax (661) 259-3750  
cell (661)644-8469  
[dsblankenship@dfg.ca.gov](mailto:dsblankenship@dfg.ca.gov)

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**A2 Daniel Blankenship, Staff Environmental Scientist, California Department of Fish and Game, 5/21/2012**

- A2-1:** Refer to revisions made to EIR Section 4.4, “Biological Resources,” as presented in Appendix A of this Final EIR. Revisions were made to this section to include Mitigation Measure BR-8, which requires the development of Nesting Bird Management Plans.

**A3 Frank Vidales, Acting Chief, Forestry Division, Prevention Services Bureau,  
County of Los Angeles Fire Department, 4/25/2012**



**COUNTY OF LOS ANGELES**

**FIRE DEPARTMENT**

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294  
(323) 881-2401

Letter A3

DARYL L. OSBY  
FIRE CHIEF  
FORESTER & FIRE WARDEN

April 25, 2012

Andrew Barnsdale, Project Manager  
State of California Public Utilities Commission  
Aliso Canyon Turbine Replacement Project  
505 Sansome Street, Suite 300  
San Francisco, CA 94111

Dear Mr. Barnsdale:

**DRAFT ENVIRONMENTAL IMPACT STATEMENT, NOTICE OF AVAILABILITY AND PUBLIC MEETINGS, ENVIRONMENTAL IMPACT REPORT, SCH NO. 2010101075, PROPOSED BY SO CAL GAS CO., APPLICATION NO. A.09-09-020, ALISO CANYON TURBINE REPLACEMENT PROJECT, ITS A PLANT STATION AND STORAGE FIELD FOR GAS AND ELECTRIC SERVICES, 12801 TAMPA AVENUE, LOS ANGELES CITY AND PART OF L A COUNTY (FFER #201200051)**

The Draft Environmental Impact Statement has been reviewed by the Planning Division, Land Development Unit, Forestry Division and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

**PLANNING DIVISION:**

**4.13 Public Services and Utilities**

**Table 4.13-1 Public Service Providers by Jurisdiction**

**Page 4.13-1:**

County of Los Angeles – The address for Los Angeles County Fire Department, Fire Station 75 should be corrected to 23310 Lake Manor Drive, Chatsworth.

A3-1

**Page 4.13-3:**

City of Santa Clarita – The nearest County Fire Station should be corrected to: Fire Station 124, at 25870 Hemingway Avenue, Stevenson Ranch. It is approximately 1.9 miles from the Newhall Substation, with an approximate response time of 6 minutes.

A3-2

**SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:**

AGOURA HILLS  
ARTESIA  
AZUSA  
BALDWIN PARK  
BELL  
BELL GARDENS  
BELLFLOWER  
BRADBURY

CALABASAS  
CARSON  
CERRITOS  
CLAREMONT  
COMMERCE  
COVINA  
CUDAHY

DIAMOND BAR  
DUARTE  
EL MONTE  
GARDENA  
GLENDORA  
HAWAIIAN GARDENS  
HAWTHORNE

HIDDEN HILLS  
HUNTINGTON PARK  
INDUSTRY  
INGLEWOOD  
IRVINDALE  
LA CANADA FLINTRIDGE  
LA HABRA

LA MIRADA  
LA PUENTE  
LAKEWOOD  
LANCASTER  
LAWDALE  
LOMITA  
LYNWOOD

MALIBU  
MAYWOOD  
NORWALK  
PALMDALE  
PALOS VERDES ESTATES  
PARAMOUNT  
PICO RIVERA

POMONA  
RANCHO PALOS VERDES  
ROLLING HILLS  
ROLLING HILLS ESTATES  
ROSEMEAD  
SAN DIMAS  
SANTA CLARITA

SIGNAL HILL  
SOUTH EL MONTE  
SOUTH GATE  
TEMPLE CITY  
WALNUT  
WEST HOLLYWOOD  
WESTLAKE VILLAGE  
WHITTIER

Andrew Barnsdale, Project Manager  
April 25, 2012  
Page 2

#### 4.13.1.1 Emergency Response

##### Fire Protection and Emergency Response

Page 4.13-4, Paragraph 2, should be corrected to read as follows:

The LACFD would respond to fire emergencies in the area of the proposed project in unincorporated Los Angeles County. The LACFD operates 24 22 battalions to provide fire protection to more than four million residents in a 2,296 2,305-square-mile service area. Battalion Six, which includes 13 8 fire stations, providing service to the cities City of Santa Clarita and the communities of Canyon Country, Chatsworth, Gorman, Newhall, Santa Clarita Stevenson Ranch and Valencia. LACFD Fire Station 75 would be the primary responder to the storage field site; Fire Station 73 124 would be the primary responder to the Newhall Substation. A3-3

##### LAND DEVELOPMENT UNIT:

1. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants. A3-4
2. This property is located within the area described by the Forester and Fire Warden as a Fire Zone 4, Very High Fire Hazard Severity Zone (VHFHSZ). All applicable fire code and ordinance requirements for construction, access, water mains, fire hydrants, fire flows, brush clearance and fuel modification plans, must be met. A3-5
3. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways, with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building. A3-6
4. Access roads shall be maintained with a minimum of 10 feet of brush clearance on each side. Fire access roads shall have an unobstructed vertical clearance clear-to-sky with the exception of protected tree species. Protected tree species overhanging fire access roads shall be maintained to provide a vertical clearance of 13 feet 6 inches. A3-7
5. The maximum allowable grade shall not exceed 15% except where topography makes it impractical to keep within such grade. In such cases, an absolute maximum of 20% will be allowed for up to 150 feet in distance. The average maximum allowed grade, including topographical difficulties, shall be no more than 17%. Grade breaks shall not exceed 10% in ten feet. A3-8
6. The development may require fire flows up to 8,000 gallons per minute at 20 per square inch residual pressure for up to a five-hour duration. Final fire flows will be based on the size of buildings, installation of fire sprinklers and the type of construction used. A3-9
7. Fire hydrant spacing shall be 300 feet and shall meet the following requirements: A3-10
  - a) No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.

Andrew Barnsdale, Project Manager  
April 25, 2012  
Page 3

- |     |  |                |
|-----|--|----------------|
| b)  | No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.  | A3-10<br>Cont. |
| c)  | Additional hydrants will be required if hydrant spacing exceeds specified distances.   |                |
| 8.  | Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs.  | A3-11          |
| 9.  | All on-site driveways/roadways shall provide a minimum unobstructed width of 26 feet, clear-to-sky. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building.  | A3-12          |
| 10. | Driveway width for non-residential developments shall be increased when any of the following conditions will exist:  | A3-13          |
| a)  | Provide 34 feet in-width, when parallel parking is allowed on one side of the access roadway/driveway. Preference is that such parking is not adjacent to the structure.   |                |
| b)  | Provide 42 feet in-width, when parallel parking is allowed on each side of the access roadway/driveway.  |                |
| c)  | Any access way less than 34 feet in-width shall be labeled "FIRE LANE" on the final recording map and final building plans.  |                |
| d)  | For streets or driveways with parking restrictions: The entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with Fire Department approved signs stating "NO PARKING - FIRE LANE" in three-inch high letters. Driveway labeling is necessary to ensure access for Fire Department use. |                |
| 11. | All access devices and gates shall comply with California Code of Regulations, Title 19, Articles 3.05 and 3.16.   | A3-14          |
| 12. | All access devices and gates shall meet the following requirements:  | A3-15          |
| a)  | Any single gated opening used for ingress and egress shall be a minimum of 26 feet in-width, clear-to-sky.   |                |
| b)  | Any divided gate opening (when each gate is used for a single direction of travel i.e., ingress or egress) shall be a minimum width of 20 feet clear-to-sky.   |                |
| c)  | Gates and/or control devices shall be positioned a minimum of 50 feet from a public right-of-way and shall be provided with a turnaround having a minimum of 32 feet of turning radius. If an intercom system is used, the 50 feet shall be measured from the right-of-way to the intercom control device.                       |                |
| d)  | All limited access devices shall be of a type approved by the Fire Department.   |                |
| e)  | Gate plans shall be submitted to the Fire Department, prior to installation. These plans shall show all locations, widths and details of the proposed gates.   |                |

Andrew Barnsdale, Project Manager  
April 25, 2012  
Page 4

- |     |  |       |
|-----|--|-------|
| 13. | Additional access and water system will be addressed with the submittal of the site plan.  | A3-16 |
| 14. | The County of Los Angeles Fire Department, Land Development Unit appreciates the opportunity to comment on this project.   |       |
| 15. | Should any questions arise regarding water systems and/or access, please contact the County of Los Angeles Fire Department, Land Development Unit Inspector, Wally Collins, at (323) 890-4243. | A3-17 |

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

- |    |   |       |
|----|---|-------|
| 1. | The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources and the County Oak Tree Ordinance. | A3-18 |
| 2. | We have not received an Oak Tree Permit application or report for review. An Oak Tree Permit may be required for this project.  | A3-19 |

**HEALTH HAZARDOUS MATERIALS DIVISION:**

- |    |   |                           |
|----|---|---------------------------|
| 1. | <p>Southern California Gas Company owns and operates the facility and the site of the proposed project, located at 12801 Tampa Avenue, Northridge, California 91326. The facility is currently permitted for above ground storage tank, hazardous materials and hazardous waste program elements. The facility previously held a CalARP (California Accidental Release Prevention Program) permit. However, regulated substances were eliminated or reduced below the threshold quantity and the permit was subsequently inactivated in November 2006.</p> <p>Initial review of the environmental impact report did not provide any detailed information regarding proposed chemical usage or quantities. It is unknown if the project will use regulated substances above threshold quantities in a covered process; if so, a Regulated Substance Registration Form must be submitted to this Department to comply with the requirements of the California Accidental Release Prevention Program, as specified in Title 19 CCR § 2740.1. The Health Hazardous Materials Division (HHMD) of this Department conducts facility inspections to ensure compliance with Titles 19 and 22 of the California Code of Regulations and Chapters 6.5, 6.67 and 6.95 of the California Health and Safety Code.</p> <p>The location of the proposed project is in a mountainous and hilly region of Los Angeles County. In October 2008, the Sesnon fire burned approximately 14,000 acres of land. Due to the close proximity of the residential population at Porter Ranch, located within a Very High Fire Hazard Severity Zone, several homes were also destroyed. The fire department inspectors determined that the cause of the fire was an electrical distribution line falling onto dry brush. Although, HHMD does not enforce brush clearance standards and regulations, it is recommended that power lines are inspected and maintained on a regular basis and brush under the lines cleared regularly to prevent fires, especially as the project proposes expansion of power lines.</p> | <p>A3-20</p> <p>A3-21</p> |
|----|---|---------------------------|



Andrew Barnsdale, Project Manager  
April 25, 2012  
Page 5

This Department looks forward to receiving additional information to further assess the potential environmental impacts resulting from this project. If you have any questions, please contact Fariba Khaledan, HMS III, at (310) 348-1786.

A3-22

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



FRANK VIDALES, ACTING CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

FV:ij

**A3 Frank Vidales, Acting Chief, Forestry Division, Prevention Services Bureau,  
County of Los Angeles Fire Department, 4/25/2012**

- A3-1:** Refer to revisions made to EIR Section 4.13, “Public Services and Utilities,” as presented in Appendix A of this Final EIR. Table 4.13-1 has been revised.
- A3-2:** Refer to revisions made to EIR Section 4.13, “Public Services and Utilities,” as presented in Appendix A of this Final EIR. Table 4.13-1 has been revised.
- A3-3:** Refer to revisions made to EIR Section 4.13, “Public Services and Utilities,” as presented in Appendix A of this Final EIR. The discussion under the heading “Emergency Response” has been revised.
- A3-4:** The applicant and SCE will comply with all applicable regulations, requirements, and policies for construction and operation of the proposed project.
- A3-5:** The applicant and SCE will comply with all applicable regulations, requirements, and policies for construction and operation of the proposed project. Per Mitigation Measure HZ-3, the applicant and SCE will take part in consultations with local fire services agencies prior to project construction, which will allow these jurisdictions to review project construction and operations plans with regard to compliance with applicable requirements and policies.
- A3-6:** The applicant and SCE will comply with all applicable building requirements imposed by the Department of Development Services and County of Los Angeles Fire Department, and will acquire building permits as needed prior to construction of the proposed project.
- A3-7:** The applicant and SCE will comply with all applicable regulations, requirements, and policies for construction and operation of the proposed project.
- A3-8:** The applicant and SCE will comply with all Los Angeles County regulations and ordinances related to grading, and will acquire grading permits approved by the Los Angeles County Planning and Development Services Department as needed prior to construction of the proposed project.
- A3-9:** The applicant and SCE will comply with all applicable regulations, requirements, and policies for construction and operation of the proposed project. In addition, per Mitigation Measure HZ-3, the applicant and SCE will take part in consultations with fire management jurisdictions prior to project construction, which will allow these jurisdictions to review project construction and operations plans with regard to compliance with applicable requirements and policies.
- A3-10:** The applicant and SCE will comply with all applicable regulations, requirements, and policies for construction and operation of the proposed project. In addition, per Mitigation Measure HZ-3 the applicant and SCE will take part in consultations with fire management jurisdictions prior to project construction, which will allow these jurisdictions to review project construction and operations plans with regard to compliance with applicable requirements and policies.

- A3-11:** The applicant and SCE will comply with all applicable regulations, requirements, and policies for construction and operation of the proposed project.
- A3-12:** The applicant and SCE will comply with all applicable regulations, requirements, and policies for construction and operation of the proposed project.
- A3-13:** The applicant and SCE will comply with all applicable regulations, requirements, and policies for construction and operation of the proposed project.
- A3-14:** The applicant and SCE will comply with all applicable regulations, requirements, and policies for construction and operation of the proposed project.
- A3-15:** The applicant and SCE will comply with all applicable regulations, requirements, and policies for construction and operation of the proposed project.
- A3-16:** The applicant and SCE will comply with all applicable regulations, requirements, and policies for construction and operation of the proposed project.
- A3-17:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. The commenter has been added to the CPUC notification mailing list for the Aliso Canyon Turbine Replacement Project EIR.
- A3-18:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project.
- A3-19:** Refer to revisions made to EIR Section 4.4, “Biological Resources,” as presented in Appendix A of this Final EIR. As a result of consultation with Los Angeles County staff, revisions were made to this section to include Mitigation Measure BR-15, which requires that the applicant and SCE implement measures to avoid and minimize damage to, and compensate for the loss of, indigenous oak trees during project construction and is consistent with the Los Angeles County oak tree protection ordinance.
- A3-20:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR. Revisions were made to subsection 4.8.4.1, “Proposed Project Hazardous Material and Waste,” to include a description of existing and proposed chemical usage and quantities at the Aliso Canyon Natural Gas Storage Field facility.
- A3-21:** Refer to Master Response to Comments About Fire Safety, and revisions to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR. The applicant and SCE will comply with all applicable regulations, requirements, and policies for construction and operation of the proposed project. In accordance with General Order 95: Rules for Overhead Electric Line Construction, General Order 165: Inspection Requirements for Electrical Distribution and Transmission Facilities, and California Public Resources Code Section 4292 and 4293 requiring owners and managers to maintain clearance in a 10-foot circumference of power poles in grass-covered areas, the applicant and SCE will maintain

transmission infrastructure associated with the proposed project throughout project construction and operation. Refer also to response to comment B4-2.

- A3-22:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. The commenter has been added to the CPUC notification mailing list for the Aliso Canyon Turbine Replacement Project EIR.

**A4 Ian MacMillan, Program Supervisor, CEQA Inter-Governmental Review, South Coast Air Quality Management District, 5/22/2012**

Letter A4

**From:** Barnsdale, Andrew <andrew.barnsdale@cpuc.ca.gov>  
**Sent:** Tuesday, May 22, 2012 6:28 PM  
**To:** Daniel Garcia  
**Cc:** Hammond, Christine J.; Herron, Christy; Borak, Mary Jo  
**Subject:** RE: Aliso Canyon Turbine Replacement Project

**Importance:** High

Mr. Garcia: the CPUC will accept late comments from the SCAQMD regarding the Aliso Canyon Turbine Replacement Project.

Please submit your comments to us by Friday May 25th, 2012, or as soon as possible thereafter.

Thank you.

*Andrew Barnsdale  
Infrastructure Permitting and CEQA  
Energy Division  
California Public Utilities Commission  
Phone: 415-703-3221*

---

**From:** Daniel Garcia [<mailto:dgarcia@aqmd.gov>]  
**Sent:** Tuesday, May 22, 2012 10:54 AM  
**To:** Barnsdale, Andrew  
**Subject:** Aliso Canyon Turbine Replacement Project

Mr. Barnsdale,

As a result of overlapping projects with limited staff resources I respectfully request that the California Public Utilities Commission provide the South Coast Air Quality Management District Staff a few more days (until Friday May 25, 2012) to submit comments on the Aliso Canyon Turbine Replacement Project. Please inform me of your agency's decision regarding this request.

Regards,

*Dan Garcia*  
Air Quality Specialist  
Planning, Rule Development, and Area Sources  
21865 Copley Drive  
Diamond Bar, CA 91765-4178  
P: (909) 396-3304  
F: (909) 396-3324

A4a-1

Click [here](#) to report this email as spam.

**Herron, Christy**

---

**From:** Daniel Garcia <dgarcia@aqmd.gov>  
**Sent:** Tuesday, May 22, 2012 6:44 PM  
**To:** Herron, Christy; andrew.barnsdale@cpuc.ca.gov  
**Cc:** Ian MacMillan  
**Subject:** Aliso Canyon Turbine Replacement Project  
**Attachments:** DEIRAlisoCanyonTurbineReplacementProject.pdf

The South Coast Air Quality Management District's comments are provided in the attached letter. Please be advised that you will also receive this letter by U.S. Mail.

Regards,

***Dan Garcia***

Air Quality Specialist  
Planning, Rule Development, and Area Sources  
21865 Copley Drive  
Diamond Bar, CA 91765-4178  
P: (909) 396-3304  
F: (909) 396-3324

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South Coast  
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • www.aqmd.gov

E-Mailed: May 22, 2012  
AlisoCanyonNG@ene.com

May 22, 2012

Mr. Andrew Barnsdale,  
Aliso Canyon Turbine Replacement Project  
505 Sansome Street, Suite 300  
San Francisco, CA 94111

**Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed  
Aliso Canyon Turbine Replacement Project**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.

The AQMD staff is concerned about the project's potentially significant regional air quality impacts from construction of the proposed project. Specifically, the lead agency determined that the project will exceed the AQMD's CEQA regional significance thresholds for NOx and VOC emissions. As a result, the lead agency incorporated Mitigation Measure AQ-1 (MM AQ-1) that requires the purchase of Regional Clean Air Incentive Market Trading Credits (RTCs). Therefore, to ensure insignificant air quality impacts from the proposed project the AQMD staff recommends that the lead agency revise MM AQ-1 in the Final EIR to make certain that, "All emission credits used to mitigate significant air quality impacts from construction of the proposed project adhere to the AQMD's CEQA policies and procedures document titled: Revised CEQA Policy and Procedures in Allowing the Use of Emissions Credits to Mitigate Significant Air Quality Impacts from Construction" (See Attachment). Also, the AQMD staff notes that past projects that have selected this type of mitigation measure required the Mitigation Agreement for the credits to be presented to the AQMD Governing Board. Consistent with this document the AQMD staff recommends that the lead agency also include the following mitigation measures pursuant to Section 15126.4 of the CEQA Guidelines.

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements,

A4b-1

A4b-2

A4b-3

Mr. Andrew Barnesdale

2

May 22, 2012

- During project construction require all internal combustion engines/construction equipment operating on the project site greater than 50 hp to meet EPA Tier 4 emission standards, where available. Also, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. | A4b-4
  - A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment. | A4b-5
  - Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:  
<http://www.aqmd.gov/tao/Implementation/SOONProgram.htm> | A4b-6
- For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:  
[www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html). | A4b-7
- Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments. | A4b-8

Sincerely,



Ian MacMillan  
Program Supervisor, CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

IM:DG

LAC120404-01  
Control Number

Attachment





**Revised CEQA Policy and Procedure in Allowing the Use of Emission Credits to Mitigate Significant Air Quality Impacts from Construction Phase**

To allow the use of emission credits to mitigate significant air quality impacts from the construction phase of a project, the project applicant should pursue the following procedure in order to comply with this SCAQMD CEQA Policy.

***Alternative Technology Mitigation***

1. Initially, the project applicant should attempt to reduce construction NOx emissions by using off-road construction equipment that meets lower future emission standards, alternative fuels and control technology on the construction equipment. If the project applicant is unsuccessful in locating equipment retrofitted with NOx oxidation catalysts and meeting the California 2001 off-road emission standards, the project applicant may request the SCAQMD's approval to surrender emission credits as CEQA mitigation to mitigate the exceedances in construction NOx emissions as a good faith effort to the SCAQMD and the lead agency.

A4b-9

***Localized Impacts***

2. Prior to the approval of the mitigation measure, the project applicant shall provide a localized air quality modeling analysis to demonstrate that localized NO<sub>2</sub> impacts would be less than significant. The SCAQMD has established a significance threshold for NOx construction emissions recommended for use by lead agencies to ensure that the effort to achieve federal or state ambient air quality standards for ozone is not hindered. The use of emission credits to mitigate NOx construction emissions may mitigate regional air quality impacts, but will not ensure that localized impacts are not significant.

A4b-10

***Emission Credits***

3. Prior to commencement of the construction project in accordance with established procedures set forth under SCAQMD's Regulation XX – Regional Clean Air Incentives Market (RECLAIM), the project applicant shall purchase the amount of pounds of NOx emission credits needed to mitigate the exceedance of the construction significance threshold for NOx emissions from the construction phase of the project. The offset credits must meet the following criteria:
  - (a) The project applicant must demonstrate that the emission credits were derived from emission reduction project(s) through existing SCAQMD protocols.
  - (b) The credit needs to be current for the time the project takes place meaning the RTCs/MSERCs have not expired before or during the time period when the emissions from the project would occur.

A4b-11

*Surrendering Emission Credits*

4. The project proponent is required to retire the entire amount of NOx emission credits needed to mitigate the exceedance of the construction significance threshold for NOx emissions prior to commencement of the construction project.

A4b-12

*Penalty for Not Reconciling in a Timely Manner*

5. If NOx emissions exceed the original estimation, the project applicant or consultant shall reconcile NOx (and, if applicable, ROG, CO and SOx) emissions that exceed the original estimation of emission credits purchased. The project proponent will be given a 15-day reconciliation period without penalties to purchase additional emission credits, if needed, to continue the project; and failure to do so will result in a penalty of purchasing additional credits in an amount equal to the additional excess emissions plus 100 percent of the additional excess emissions. For example, if the project emits 500 pounds of additional excess NOx emissions beyond the required amount of pounds of NOx credits, and the 500 pounds of additional excess NOx emissions are not mitigated with suitable emission credits within the reconciliation period, then the project proponent will be responsible for providing 1,000 pounds of NOx credits to the SCAQMD;

A4b-13

*Recordkeeping and Reporting*

6. Construction contractor shall record the hour meter reading for each piece of equipment and the project applicant shall record all the equipment used and hours of operations. The project applicant or consultant shall prepare and submit a monthly report within seven days after the end of each construction month to demonstrate that conditions have been met. The monthly report shall summarize equipment used, hours of operation, NOx emissions as well as identifying any problems that occur and corrective actions implemented by the contractor. If NOx emissions exceed the original estimation, the report should also include the additional ROG, CO and SOx emissions emitted to ensure no exceedance of the SCAQMD's CEQA NOx construction significance threshold.

A4b-14

*Posting of Contacts*

7. The project applicant shall post a sign at the project boundary containing contact information (contact name, telephone number, and email address) for lead agency people with questions or comments regarding construction activities at the site.

A4b-15

*Approval Documentation*

Because the SCAQMD is not the Lead Agency for land development projects, it is not responsible for approving the environmental document and/or Mitigation Monitoring Plan (MMP) in which the mitigation measure is required. However, the SCAQMD typically has approval authority over the mitigation measure as well as enforcement and

A4b-16

monitoring responsibility under the MMP. In accordance with the Public Resources Code §21081.6, the MMP should outline the party responsible for implementing mitigation and the enforcement agency. Pursuant to CEQA Guidelines §15126.4(a)(2), to ensure that the mitigation measure is fully enforceable through a legally binding instrument, a Memorandum of Understanding (MOU) or other legally binding contractual agreement should be prepared. The MOU must be signed by the project proponent, the SCAQMD and the Lead Agency.

A4b-16  
Cont.

**Purchasing and Surrendering Mobile Source Emission Reduction Credits (MSERCs) as CEQA Mitigation for Construction Emissions**  
CEQA Policy, March 2005

1. Comply with the "Revised CEQA Policy and Procedure in Allowing the Use of Emission Credits to Mitigate Significant Air Quality Impacts from Construction Phase" by:
  - a. providing a localized air quality modeling analysis to demonstrate that localized NO<sub>2</sub> impacts would be less than significant;
  - b. demonstrating that the emission credits were derived from emission reduction project(s) through existing SCAQMD protocols (e.g., Rule 1612 – Credits for Clean On-Road Vehicles);
  - c. ensuring the credit is current for the time the project takes place meaning the MSERCs have not expired before or during the time period when the emissions from the project would occur;
  - d. reconciling NO<sub>x</sub> (and, if applicable, ROG, CO and SO<sub>x</sub>) emissions that exceed the original estimation of emission credits purchased if NO<sub>x</sub> emissions exceed the original estimation; and
  - e. preparing and submitting a monthly report within seven days after the end of each construction month to demonstrate that conditions have been met.
2. Contact Vicki White, Air Quality Specialist, in the SCAQMD Technology Advancement Office, at (909) 396-3436 who can provide the list of MSERC brokers.
3. Contact the broker to negotiate the purchase of the amount needed to offset the emissions which exceed the daily significance threshold during the construction phase of the project.
4. Retire the entire amount of NO<sub>x</sub> emission credits prior to commencement of the project to mitigate the exceedance of the construction significance threshold for NO<sub>x</sub> emissions to the SCAQMD through one of two means:
  - a. Convert the credit amount into a physical certificate which is issued to the purchaser of the credit and is surrendered back to the SCAQMD; or
  - b. Establish an MSERC account with the SCAQMD (Vicki White) and transfer the MSERCs into that account to retire them with the SCAQMD.

A4b-17

A4b-18

A4b-19

A4b-20

**A4 Ian MacMillan, Program Supervisor, CEQA Inter-Governmental Review, South Coast Air Quality Management District (SCAQMD), 5/22/2012**

- A4a-1:** The CPUC extended the comment period on the Draft EIR past the initial 45-day period. The review period for the Draft EIR started April 4, 2012 and was extended by two weeks (to June 5) so that comments, such as those submitted by the SCAQMD, that were submitted to the CPUC after the 45-day period could be considered.
- A4b-1:** Refer to revisions made to EIR Section 4.3, "Air Quality," as presented in Appendix A of this Final EIR. Revisions were made to this section to include Mitigation Measure AQ-3 (formerly Mitigation Measure AQ-1), which indicates that all emission credits used to mitigate significant air quality impacts from construction of the proposed project shall adhere to the SCAQMD's CEQA policies and procedures document titled *Revised CEQA Policy and Procedures in Allowing the Use of Emissions Credits to Mitigate Significant Air Quality Impacts from Construction*.
- A4b-2:** Refer to revisions made to EIR Section 4.3, "Air Quality," as presented in Appendix A of this Final EIR. Revisions were made to this section to include Mitigation Measure AQ-3, which indicates that the SCAQMD may require that the Mitigation Agreement be presented before and reviewed by the SCAQMD Governing Board.
- A4b-3:** Refer to revisions made to EIR Section 4.3, "Air Quality," as presented in Appendix A of this Final EIR. Revisions which incorporate some of the recommendations in the commenter's letter were made to this section to include Mitigation Measures AQ-1 and AQ-2, which would require the applicant and SCE to implement construction practices that would be protective of air quality.
- A4b-4:** Refer to response to comment A4b-3.
- A4b-5:** Refer to response to comment A4b-3.
- A4b-6:** This information is included in the public record, will be taken into account by decision-makers when they consider the proposed project, and has been transmitted to the applicant and SCE.
- A4b-7:** Refer to revisions made to EIR Section 4.3, "Air Quality," as presented in Appendix A of this Final EIR. Revisions were made to this section to include Mitigation Measure AQ-2, which requires the implementation of measures as determined appropriate by the applicant and SCE in consultation with the SCAQMD, and Mitigation Measure AQ-3, which discusses a Mitigation Agreement for Purchase of Oxides of Nitrogen Credits, if required.
- A4b-8:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. The CPUC will provide SCAQMD with written responses to comments contained in the comment letter prior to the adoption of this Final EIR.
- A4b-9:** Refer to response to comment A4b-7.

- A4b-10:** Refer to EIR Section 4.3, “Air Quality,” as presented in Appendix A of this Final EIR, which includes a localized significance threshold (LST) analysis per the methodology developed by the SCAQMD, which indicates that the impacts of emissions of NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> during project construction would be less than applicable LST levels, and impacts would be less than significant.
- A4b-11:** Refer to response to comment A4b-7.
- A4b-12:** Refer to response to comment A4b-7.
- A4b-13:** Refer to response to comment A4b-7.
- A4b-14:** Refer to response to comment A4b-7.
- A4b-15:** Refer to response to comment A4b-7.
- A4b-16:** Refer to response to comment A4b-7. The MMCRP, presented in Chapter 5 of this Final EIR, outlines the parties responsible for implementing mitigation and the enforcement agency for each project APM and mitigation measure, as appropriate.
- A4b-17:** Refer to response to comment A4b-7.
- A4b-18:** Refer to response to comment A4b-7.
- A4b-19:** Refer to response to comment A4b-7.
- A4b-20:** Refer to response to comment A4b-7.

**A5 Robert Newman, Acting Director of Community Development, City of Santa Clarita, 5/14/2012**



City of  
**SANTA CLARITA**

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Phone: (661) 259-2489 • FAX: (661) 259-8125  
[www.santa-clarita.com](http://www.santa-clarita.com)

Letter A5

May 14, 2012

RECEIVED MAY 17 2012

Aliso Canyon Turbine Replacement Project  
California Public Utilities Commission  
505 Sansome Street, Suite 300  
San Francisco, CA 94111

Subject: Comments on Draft Environmental Impact Report (DEIR) for the Aliso Canyon Turbine Replacement Project

Thank you for the opportunity to review and comment on the above referenced DEIR. The City recognizes the public necessity of this project and is supportive of the project goals.

Project Description: To provide sufficient power for the new electric compressors at the Southern California Gas Company's Aliso Canyon underground natural gas storage facility, the 64-kV subtransmission line running between the Newhall substation and the Aliso Canyon site in Porter Ranch must be upgraded. All existing lattice steel towers (64 towers in total) within the existing Southern California Edison right-of-way will be replaced by up to 78 tubular steel towers. Approximately 19 of the towers to be removed and replaced are within the City boundary, most are abutting Wiley Canyon Road between Lyons Avenue and Calgrove Avenue. The existing towers along Wiley Canyon Road range between 40-65 feet in height; the replacement towers in this area could be up to 85 feet in height. The new towers within the rugged terrain to the south of Calgrove Avenue could be up to 150 feet in height.

For the most part, the DEIR adequately assesses potential project impacts and outlines reasonable mitigation measures to reduce potential project impacts to less than significant levels. Based on the visual simulations, which are included in the DEIR, we agree with the conclusion of the DEIR that the overall visual impact of the new taller towers will be less than significant due to the sleeker, single-pole tubular design.

A5-1

City Request for Mitigation Measures: The City does request incorporation of additional mitigation measures into the Final EIR to further address potential temporary construction impacts within the following functional areas:

A5-2

Noise: According to the project description (pages 2-46) wire-stringing activities are expected to take approximately 38 days. During wire-stringing activities, helicopters would be used for approximately six hours per day. Table 4.11-18 indicates that daytime noise standards will be exceeded at multiple sensitive receptor locations, in some instances exceeding the noise standard by more than 20 decibels (dBA). The only proposed mitigation measures addressing temporary construction noise impacts is APM NS-3 Notification Procedures, which requires the applicant to



California Public Utilities Commission  
May 14, 2012  
Page 2

notify sensitive receptors within 300 feet of construction activities at least two weeks prior to commencement of construction activities. While a 300-foot notification radius may provide adequate notification for ground-based construction noise impacts, the City recommends a broader and more robust public outreach effort given the more extensive temporary impact footprint of the anticipated aerial operations. The City strongly encourages the CPUC to include an additional mitigation measure, which requires the applicant to provide broad-based community outreach utilizing a combination of direct mail and media press releases to provide project background and specific information concerning the construction schedule, hours and duration, particularly with respect to helicopter operations. The City of Santa Clarita can assist in this effort by reposting the applicant's press releases in an appropriate location on the City's website.

A5-2  
Cont.

Traffic: Tower removal and replacement is likely to require temporary lane closures along Wiley Canyon Road, with possible temporary lane closures on Lyons Avenue and Calgrove Avenue near Wiley Canyon road. Potentially significant traffic impacts could occur if multiple lanes were closed simultaneously or if lane closures occurred during peak traffic hours or during special events. Consequently, the City strongly encourages the CPUC to include an additional traffic mitigation measure requiring the applicant to confer with the City Traffic Engineer and to incorporate his recommendations into the Traffic Control Plan prior to commencing work within the City's boundaries.

A5-3

If you have any additional questions, please contact me or David Koontz, Associate Planner, at (661) 255-4330.

Sincerely,



Robert Newman  
Acting Director of Community Development

RN:DK:lep

S:\CD\current\irp\irp files\socalgas\Aliso Canyon DEIR.doc

cc: Ken Pulskamp, City Manager  
Ken Striplin, Assistant City Manager  
Jeff Hogan, Planning Manager  
David Koontz, Associate Planner

**A5 Robert Newman, Acting Director of Community Development, City of Santa Clarita, 5/14/2012**

- A5-1:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project.
- A5-2:** Refer to revisions made to EIR Section 4.11, “Noise,” as presented in Appendix A of this Final EIR. Revisions were made to this section to include the addition of Mitigation Measure NS-2, which requires SCE to perform broad-based public outreach, using methods such as a combination of direct mail and media press releases, to provide project background and specific information concerning project construction helicopter use, including construction schedule, hours, duration, and location.
- A5-3:** Refer to revisions made to EIR Section 4.15, “Transportation and Traffic,” as presented in Appendix A of this Final EIR. Revisions were made to this section to include the addition of Mitigation Measure TT-1, which requires SCE to submit a Traffic Control Plan for the project to the City of Santa Clarita traffic engineer, and incorporate any recommendations from this review into the Traffic Control Plan.



**A6 Robert Newman, Acting Director of Community Development, City of Santa Clarita, 5/17/2012**



City of  
**SANTA CLARITA**

23920 Valencia Boulevard • Suite 300 • Santa Clarita, California 91355-2196  
Phone: (661) 259-2489 • FAX: (661) 259-8125  
[www.santa-clarita.com](http://www.santa-clarita.com)

Letter A6

May 17, 2012

RECEIVED MAY 29 2012

Aliso Canyon Turbine Replacement Project  
California Public Utilities Commission  
505 Sansome Street, Suite 300  
San Francisco, CA 94111

Subject: Comments on Draft Environmental Impact Report (DEIR) for the Aliso Canyon Turbine Replacement Project

Thank you for the opportunity to review and comment on the above referenced DEIR. The City recognizes the public necessity of this project and is supportive of the project goals.

Project Description: To provide sufficient power for the new electric compressors at the Southern California Gas Company's Aliso Canyon underground natural gas storage facility, the 64-kV subtransmission line running between the Newhall substation and the Aliso Canyon site in Porter Ranch must be upgraded. All existing lattice steel towers (64 towers in total) within the existing Southern California Edison right-of-way will be replaced by up to 78 tubular steel towers. Approximately 19 of the towers to be removed and replaced are within the City boundary, most are abutting Wiley Canyon Road between Lyons Avenue and Calgrove Avenue. The existing towers along Wiley Canyon Road range between 40-65 feet in height; the replacement towers in this area could be up to 85 feet in height. The new towers within the rugged terrain to the south of Calgrove Avenue could be up to 150 feet in height.

For the most part, the DEIR adequately assesses potential project impacts and outlines reasonable mitigation measures to reduce potential project impacts to less than significant levels. Based on the visual simulations, which are included in the DEIR, we agree with the conclusion of the DEIR that the overall visual impact of the new taller towers will be less than significant due to the sleeker, single-pole tubular design.

A6-1

City Request for Mitigation Measures: The City does request incorporation of additional mitigation measures into the Final EIR to further address potential environmental impacts within the following functional areas:

A6-2

Construction Noise: According to the project description (pages 2-46) wire-stringing activities are expected to take approximately 38 days. During wire-stringing activities, helicopters would be used for approximately six hours per day. Table 4.11-18 indicates that daytime noise standards will be exceeded at multiple sensitive receptor locations, in some instances exceeding the noise standard by more than 20 decibels (dBA). The only proposed mitigation measures addressing temporary construction noise impacts is APM NS-3 Notification Procedures, which requires the applicant to notify sensitive receptors within 300 feet of construction activities at least two weeks prior to commencement of construction activities. While a 300-foot notification radius may provide adequate



Aliso Canyon Turbine Replacement Project  
May 17, 2012  
Page 2

notification for ground-based construction noise impacts, the City recommends a broader and more robust public outreach effort given the more extensive temporary impact footprint of the anticipated aerial operations. The City strongly encourages the CPUC to include an additional mitigation measure, which requires the applicant to provide broad-based community outreach utilizing a combination of direct mail and media press releases to provide project background and specific information concerning the construction schedule, hours and duration, particularly with respect to helicopter operations. The City of Santa Clarita can assist in this effort by reposting the applicant's press releases in an appropriate location on the City's website.

A6-2  
Cont.

Operational Noise: The text of the DEIR describes the potential for operational noise due to the corona effect—the crackling, hissing or humming noise which is “most noticeable during wet conductor conditions such as rain or fog. SCE will install polymer (silicon rubber) insulators on the two lines proposed to be modified on the 66-IV subtransmission system. This material is hydrophobic and minimizes the accumulation of surface contaminants such as soot and dirt, which in turn reduces the potential for corona noise to be generated at the insulators.” In order to ensure that potential for new sources of corona noise are minimized, the City requests that the CPUC require the installation of the polymer insulators on the lines proposed to be modified as a formal mitigation measure.

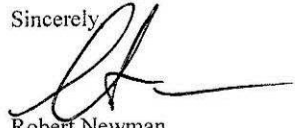
A6-3

Traffic: Tower removal and replacement is likely to require temporary lane closures along Wiley Canyon Road, with possible temporary lane closures on Lyons Avenue and Calgrove Avenue near Wiley Canyon road. Potentially significant traffic impacts could occur if multiple lanes were closed simultaneously or if lane closures occurred during peak traffic hours or during special events. Consequently, the City strongly encourages the CPUC to include an additional traffic mitigation measure requiring the applicant to confer with the City Traffic Engineer and to incorporate his recommendations into the Traffic Control Plan prior to commencing work within the City's boundaries.

A6-4

If you have any additional questions, please contact me or David Koontz, Associate Planner, at (661) 255-4330.

Sincerely



Robert Newman  
Acting Director of Community Development

RN:DK:lep  
S:\CD\current\ir\p\files\socalgas\Aliso Canyon DEIR.doc

cc: Ken Pulskamp, City Manager  
Ken Striplin, Assistant City Manager  
Jeff Hogan, Planning Manager  
David Koontz, Associate Planner

**A6 Robert Newman, Acting Director of Community Development, City of Santa Clarita, 05/17/2012**

**A6-1:** Refer to response to comment A5-1.

**A6-2:** Refer to response to comment A5-2.

**A6-3:** Refer to revisions made to EIR Section 4.11, “Noise,” as presented in Appendix A of this Final EIR. Revisions were made to this section to include the addition of Mitigation Measure NS-4, which requires SCE to install polymer (silicon rubber) insulators on the two lines proposed to be modified on the 66-kV subtransmission system.

**A6-4:** Refer to response to comment A5-3.

**A7 Toan Duong, Land Development Division, Los Angeles County Department of Public Works, 6/5/2012**

Letter A7

**From:** Duong, Toan <TDUONG@dpw.lacounty.gov>  
**Sent:** Tuesday, June 05, 2012 3:02 PM  
**To:** Barnsdale, Andrew; Herron, Christy  
**Cc:** Cruz, Ruben; Yanez, Jarrett; Ibrahim, Amir; Lee, Clint; Wan, Jeremy; Burger, Steve  
**Subject:** Aliso Canyon Turbine Replacement Project- DEIR Response

Mr. Barnsdale,

Thank you for the opportunity to review the DEIR for the Aliso Canyon Turbine Replacement project. The project is for a new, electric-driven Central Compressor Station and replacement of existing compressors, relocation of office facilities and guardhouse, also a new, four circuit, approximately 1,200-foot, 12-kV Plant Power Line. The following comments are for your consideration and applies to the environmental documents only:

- **Hazards-Soils/Geology**

All or portion of the site is located within a potentially liquefiable area per the State of California Seismic Hazard Zones Map – Oat Mountain, Newhall, and San Fernando Quadrangles. Also, all or portion of the site is located within the Alquist-Priolo Earthquake Fault Zone. Referenced soils and geology reports, including but not limited to the report prepared by Globus Engineering, should be included in the EIR as necessary. Additionally, updated soils and geology reports that address the proposed project should be included in the DEIR. Seismic design parameters may also need to be updated based on the latest building code. Determine if any recommended mitigation of liquefaction, landslides, or surface fault rupture will require grading or relocation of proposed structures. If so, depict the recommended mitigation measures on a plan or figure and include the plan or figure in the DEIR.

A7-1

A7-2

A7-3

If you have any questions regarding soils/geology comments, please contact Mr. Jeremy Wan at (626) 458-4925 or email at [jwan@dpw.lacounty.gov](mailto:jwan@dpw.lacounty.gov).

A7-4

- **Building**

For relocation of office facilities and guardhouse, submit plans to the County of Los Angeles, Department of Public Works, Building and Safety Division, Santa Clarita District office for review and permit issuance.

A7-5

If you have any questions regarding building permit comment, please contact Mr. Clint Lee at (626) 458-3154 or email at [cllee@dpw.lacounty.gov](mailto:cllee@dpw.lacounty.gov).

A7-6

If you have any other questions, please contact me directly. Thank you.

A7-7

Toan Duong  
(626) 458-4915  
Land Development Division  
Los Angeles County Department of Public Works

---

**From:** Barnsdale, Andrew [<mailto:andrew.barnsdale@cpuc.ca.gov>]  
**Sent:** Wednesday, April 11, 2012 4:09 PM  
**To:** Yanez, Jarrett  
**Cc:** Duong, Toan; Cruz, Ruben; Herron, Christy  
**Subject:** RE: Aliso Canyon Turbine Replacement Project- Link to EIR

Hi Jarrett: I've pasted the link below.

The link to the Draft EIR is here:

[http://www.cpus.ca.gov/Environment/info/ene/aliso\\_canyon/DEIR/Aliso\\_Canyon\\_DEIR\\_Vol1.pdf](http://www.cpus.ca.gov/Environment/info/ene/aliso_canyon/DEIR/Aliso_Canyon_DEIR_Vol1.pdf)

*Andrew Barnsdale  
Infrastructure Permitting and CEQA  
Energy Division  
California Public Utilities Commission  
Phone: 415-703-3221*

---

**From:** Yanez, Jarrett [<mailto:JYANEZ@dpw.lacounty.gov>]  
**Sent:** Wednesday, April 11, 2012 7:49 AM  
**To:** Barnsdale, Andrew  
**Cc:** Duong, Toan; Cruz, Ruben  
**Subject:** Aliso Canyon Turbine Replacement Project- Link to EIR

Mr. Andrew Barnsdale,

We are in the process of reviewing the Draft EIR for the Aliso Canyon Turbine Replacement project and I am unable to locate the EIR online. Can you please provide us a link to access this document? Thank you.

A7-8

**Jarrett Yanez**  
Los Angeles County Department- Public Works  
Land Development Division || CEQA Unit  
(626) 458-7152

**CONFIDENTIALITY NOTICE:** This email message, including any attachments, from the Department of Public Works is intended for the official and confidential use of the recipients to whom it is addressed. It contains information that may be confidential, privileged, attorney work product, or otherwise exempted from disclosure under applicable law. If you have received this message in error, be advised that any review, disclosure, use, dissemination, distribution, or reproduction of this message or its contents is strictly prohibited. Please notify the sender of this email immediately by reply email that you have received this message in error, and immediately destroy this message, including any attachments. Thank you in advance for your cooperation.

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**A7 Toan Duong, Land Development Division, Los Angeles County Department of Public Works, 6/5/2012**

- A7-1:** Refer to revisions made to EIR Section 4.6, “Geology, Soils, and Mineral Resources,” including a discussion of local existing conditions related to liquefaction, landslides, and surface fault rupture, as presented in Appendix A of this Final EIR. The applicant and SCE will comply with all applicable regulations, requirements, and policies for construction and operation of the proposed project. Project reports on geological conditions and geotechnical analyses have been included in this Final EIR (Appendix C).
- A7-2:** The applicant and SCE will comply with all applicable regulations, requirements, and policies for construction and operation of the proposed project, and will submit applications for building permits, as needed, prior to construction.
- A7-3:** No revision is required. As described in EIR Section 4.6, “Geology, Soils, and Mineral Resources,” no mitigation is required to address risks associated with liquefaction, landslides, or surface fault rupture.
- A7-4:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project.
- A7-5:** The applicant and SCE will comply with all applicable regulations, requirements, and policies for construction and operation of the proposed project.
- A7-6:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. The commenter has been added to the CPUC notification mailing list for the Aliso Canyon Turbine Replacement Project EIR.
- A7-7:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. The commenter has been added to the CPUC notification mailing list for the Aliso Canyon Turbine Replacement Project EIR.
- A7-8:** The CPUC responded to this comment in an email dated April 12, 2012, by providing Mr. Yanez with a link to the DEIR on the CPUC’s website for the project application.



**A8 Special Filings Unit, Secretary of State, Business Programs Division, 4/5/2012**

Letter A8



**Secretary of State  
Business Programs Division**  
Special Filings, P.O. Box 942877, Sacramento, CA 94277-0001

April 5, 2012

Aliso Canyon Turbine Replacement Project  
C/o Ecology and Environment, Inc.  
505 Sansome St., Ste. 300  
San Francisco, CA 94111-3155

To Whom It May Concern:

The enclosed Notice of Availability and Public Meetings document received in our office is being returned without action. Without a letter of instruction we are unable to proceed. If the Notice is intended for the Secretary of State's office, please state the California Code section when resubmitting.

A8-1

Sincerely,  
Special Filings Unit

California Secretary of State  
[www.sos.ca.gov](http://www.sos.ca.gov)  
(916) 653-3984

**A8 Special Filings Unit, Secretary of State, Business Programs Division, 4/5/2012**

**A8-1:** No response is required.



### **3.3.2 Comments Made by Individuals**

This section provides responses to comments about the Draft EIR received from individuals.

**B1 Frederick Senko, 4/4/2012**

Letter B1

**From:** fredericksenko@aol.com  
**Sent:** Wednesday, April 04, 2012 11:26 AM  
**To:** Herron, Christy  
**Subject:** Reseda Resident Seeks Map

Regarding the project, is there a map I can see on the computer or a paper copy of the facility?

B1-1

Thanks

Frederick Senko  
19201 Schoolcraft St  
Reseda, CA 91335

818 708-2450

Click [here](#) to report this email as spam.

**B1 Frederick Senko, 4/4/2012**

- B1-1:** The CPUC responded to this comment with an email dated April 4, 2012, providing Mr. Senko with a link to the DEIR on the CPUC website. The CPUC also provided a link to the CPUC main project website, which summarizes the proposed Aliso Canyon Turbine Replacement Project and provides maps showing the Aliso Canyon Natural Gas Storage Field facility location and boundaries of the proposed project, including associated facilities and transmission upgrades.

**B2 Kathy Hobbs, 5/9/2012**

Letter B2

**From:** Kathy Hobbs <KHobbs@corrpro.com>  
**Sent:** Wednesday, May 09, 2012 2:55 PM  
**To:** Herron, Christy  
**Subject:** Information required

Could you please send me the following information on this project: Aliso Canyon Compressor Station

B2-1

Owner Name:  
Address:  
City, State, Zip:  
Phone Number:

Site Address:  
City, State, Zip:

*Kathleen M Hobbs*  
*Corpro Companies*  
*10260 Matern Place*  
*Santa Fe Springs, CA 90670*  
*Phone: (562) 944-1636 Ext. 260242*  
*Fax: (562) 946-5634*

-----  
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**B2 Kathy Hobbs, 5/9/2012**

**B2-1:** The CPUC responded to this comment in an email dated May 9, 2012, by sending Ms. Hobbs the name, address, and phone number of the Aliso Canyon Natural Gas Storage Field facility owner.

**B3 Steven Petto, representing AECOM, 5/10/2012**

Letter B3

**From:** Petto, Steven <Steven.Petto@aecom.com>  
**Sent:** Thursday, May 10, 2012 10:36 AM  
**To:** Herron, Christy  
**Subject:** Aliso Canyon Turbine Replacement Project

Please add me to the CPUC notification mailing list for the Aliso Canyon Turbine Replacement Project.

B3-1

**Steven R. Petto, P.E.**  
Engineering Manager, Energy  
D 510.879.4517  
C 510.847.5008  
[steven.petto@aecom.com](mailto:steven.petto@aecom.com)

**AECOM**  
2101 Webster Street, Suite 1000, Oakland, CA 94612  
[www.aecom.com](http://www.aecom.com)

Click [here](#) to report this email as spam.

**B3 Steven Petto, representing AECOM, 5/10/2012**

**B3-1:** The commenter has been added to the CPUC notification mailing list for the Aliso Canyon Turbine Replacement Project EIR.

**B4     Craig Simon, 5/21/2012**

**Herron, Christy**

---

**From:** Craig Simon <craigscottsimon@me.com>  
**Sent:** Monday, May 21, 2012 5:03 PM  
**To:** andrew.barnsdale@cpuc.ca.gov  
**Cc:** Herron, Christy  
**Subject:** Aliso Canyon Turbine Project/Public Commentary

Attached please find a courtesy copy of a letter mailed to Andrew Barnsdale and "[AlisoCanyonNG@ene.com](mailto:AlisoCanyonNG@ene.com)," with public comment on the Aliso Canyon Turbine Project of Southern California Gas Company.

Craig S. Simon

Click [here](#) to report this email as spam.



Letter B4

*Craig S. Simon*  
*Irvine, California*  
[craigscottsimon@me.com](mailto:craigscottsimon@me.com)

May 21, 2012

*Via Email to:*  
[AlisoCanyonNG@ene.com](mailto:AlisoCanyonNG@ene.com)  
[andrew.barnsdale@cpuc.ca.gov](mailto:andrew.barnsdale@cpuc.ca.gov)

*and Overnight Mail to:*

Aliso Canyon Turbine Replacement Project  
505 Sansome Street, Suite 300  
San Francisco, CA 94111

Andrew Barnsdale, CPUC Project Manager  
California Public Utilities Commission  
505 Sansome Street, Suite 300  
San Francisco, CA 94111

Re: Aliso Canyon Turbine Project  
Public Comment on Draft EIR Information

To the California Public Utilities Commission:

This public comment is submitted because of my genuine concern as a citizen about whether Southern California Gas Company will adequately set up its business practices to guard against the risk of fire resulting from the operation of the high voltage lines that will be necessary to run the contemplated new turbine engines.

B4-1

While a customer of the Gas Company, my knowledge of the Aliso Canyon operation comes from being the attorney for entities suing Southern California Gas Company for starting the Sesnon fire of October 13, 2008.<sup>1</sup>

B4-2

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<sup>1</sup> This letter is written by Craig S. Simon as an individual and not on behalf of my clients. In the current litigation that is still pending in Los Angeles Superior Court, the Gas Company denies responsibility for a fire that started when a high voltage conductor broke, fell to the ground in an energized state, ignited brush, and then spread by wind to destroy surrounding neighborhoods. The Gas Company takes the position that since it hired an electrical contractor that only the electrical contractor could be liable. The electrical contractor has testified that he tried to sell a regular inspection program to the Gas Company, but was told by the manager of the Aliso Facility that the Gas Company did not have a budget for routine inspections!

B4-3

Aliso Canyon Turbine Replacement Project  
Andrew Barnsdale, CPUC Project Manager  
California Public Utilities Commission  
May 21, 2012  
Page 2

The Gas Company's litigation position in the Sesnon fire case is concerning because the Gas Company claims that it can escape liability because it has no sophistication or knowledge in the area of electricity and the only party that could be held liable for a fire from the high voltage electrical grid is its electrical contractor. **If the new high voltage lines somehow cause a new fire in the future, is it the Gas Company's position that it is just "tough luck" for the nearby homeowners, and they have zero responsibility for actions or inactions of their electrical contractor Henkels and McCoy, Inc.?**

B4-3  
Cont.

I have conducted or attended the depositions of 15 key Aliso Canyon employees, including but not limited to Lawrence Bittleston. Mr. Bittleston's deposition was taken May 3, 2012 and he stated that if this project was approved, he would be in charge of overseeing the electrical grid supplying energy to the turbine engines. He also admitted that he did not have expertise in electricity. The following were questions I asked and Mr. Bittleston's responses:

B4-4

- Q Are you in charge of the electrical system now at Aliso?
- A I'm in charge of the maintenance of it; yes.
- Q Okay. And if the new turbines that you guys want to put in are approved, there'll be a lot of electrical work there, right?
- A Yes.
- Q You've seen the EIR?
- A I've seen parts of it.
- Q They're going to bring in new lines from Chatsworth for So. Cal Edison?
- A That's incorrect.
- Q Oh, okay. What are they going to do, build a new 66 KV line?
- A No.
- Q What are they going to do for electricity?
- A They're bringing in a new line from Newhall to Aliso Canyon.

Aliso Canyon Turbine Replacement Project  
Andrew Barnsdale, CPUC Project Manager  
California Public Utilities Commission  
May 21, 2012  
Page 3

Q And what voltage is it going to be?

A I believe it's 66 KV.

Q Okay. And are you going to be the person in charge of taking care of that line and making sure it's maintained?

A Yes.

Q **And do you have any expertise in electricity that allows you to oversee that?**

A No.

B4-4  
Cont.

It is common knowledge that the Gas Company is owned by Sempra Energy, which also owns San Diego Gas & Electric. I would feel more comfortable with the electrical facilities at the Gas Company if the PUC required SDG&E to be involved in overseeing the maintenance of the lines. Rudy Weibel (now retired, but Director of Gas Storage Operations), who was the direct supervisor of the plant manager of the Aliso Canyon facility in 2008, testified on February 15, 2012 that he never asked anyone at SDG&E to come out to look at the electric line at Aliso Canyon (between 2000 and 2008) and did not think it was a good idea for the Gas Company to do so. He only called upon the expertise of SDG&E as a "political move" to come out right after the fire:

B4-5

B4-6

Q Did you ever ask anyone at San Diego Gas and Electric to come out to the Aliso Canyon facility and view the electric line at any time?

A Yes.

Q Okay, I'm going to now say from the time 2000 to the fire in 2008.

A No.

Q Why not?

A I didn't feel it was required.

Q You think it would have been a good idea?

A No.

Aliso Canyon Turbine Replacement Project  
Andrew Barnsdale, CPUC Project Manager  
California Public Utilities Commission  
May 21, 2012  
Page 4

Q ...What was the reason - you said at some point  
you did talk to them about that?

B4-6  
Cont.

A Yes.

Q When was that?

A After the fire.

Q What was the need to call them after the  
fire?

A To assure that the line was being maintained  
adequately, the lines.

Q Okay. Why did you need to determine that at  
that point, whether the lines were being maintained  
adequately?

A To bluntly put, protect from second guessing  
from corporate entities.

Q Like who?

A Senior management.

Q At San Diego Gas and Electric at Sempra?<sup>2</sup>

A And So. Cal.

Q So essentially getting the electric company  
involved was a good political move so that you  
couldn't be second guessed at the gas company later  
about the electric lines at the gas company?

A Correct.

Getting SDG&E involved in the high voltage electric system at Aliso is more than  
a good political move. I think it is required to ensure the safe operation of the electrical  
system given SCGC's position that it knows nothing about electricity.

This new turbine project is being instituted as part of a settlement between the  
CPUC and the Gas Company, and I do realize the absolute necessity of gas storage to the

B4-7

<sup>2</sup> Official transcript says "at" but I believe the audio recording will show that the word was "and."

Aliso Canyon Turbine Replacement Project  
Andrew Barnsdale, CPUC Project Manager  
California Public Utilities Commission  
May 21, 2012  
Page 5

delivery of gas to the customers of the Gas Company. I am in favor of new turbines that will allow for faster and more efficient gas injection. But from my observations, Gas Company personnel have not applied the right resources to the maintenance of the high voltage electrical system that is necessary for injection and withdrawal and - as part of any approval process - they should be required to take responsibility should a fire occur. The nearby homeowners should not bear a greater risk of system failure than other customers of the Gas Company.

B4-7  
Cont.

B4-8

I would like the opportunity to address the decision makers at the CPUC and/or any involved Administrative Law Judges regarding the material and information that has come to light regarding the Gas Company's prior and current operations at the Aliso Canyon facility.

B4-9

Very truly yours,



CRAIG S. SIMON

*Craig S. Simon*  
*Irvine, California*  
[craigscottsimon@me.com](mailto:craigscottsimon@me.com)

May 22, 2012

*Via Email Only to:*  
[AlisoCanyonNG@ene.com](mailto:AlisoCanyonNG@ene.com)  
[andrew.barnsdale@cpuc.ca.gov](mailto:andrew.barnsdale@cpuc.ca.gov)

Aliso Canyon Turbine Replacement Project  
505 Sansome Street, Suite 300  
San Francisco, CA 94111

Andrew Barnsdale, CPUC Project Manager  
California Public Utilities Commission  
505 Sansome Street, Suite 300  
San Francisco, CA 94111

Re: Aliso Canyon Turbine Project  
Public Comment on Draft EIR Information

To the California Public Utilities Commission:

Please add this post script to my public comment sent yesterday, May 21, 2012. Henkles and McCoy, Inc. began work at Aliso Canyon well after the Sesnon fire and had nothing to do with it. The use of the term "the electrical contractor" elsewhere in the letter and in footnote 1 refers to the prior electrical contractor.

B4-10

My point in paragraph 1 on page 2 is that the Gas Company should take responsibility for any future fire caused by its electrical system and should not try to delegate the duty it owes to its customers and nearby neighbors to some other third party.

Very truly yours,



CRAIG S. SIMON

**B4 Craig Simon, 5/21/2012**

**B4-1:** Refer to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”).

**B4-2:** The commenter refers to the 2008 Sesnon fire, which is briefly mentioned in the Proponent’s Environmental Assessment (PEA) on page 4.7-7 (under 4.7.1.5, “Wildland Fire”). The EIR includes a fuller description of the Sesnon fire and acknowledges that the baseline level of risk for fire hazard in the project area, especially the area of the project components located on the Aliso Canyon Natural Gas Storage Field facility site, is extremely high, as evidenced by the destruction caused by the Sesnon fire.

Per Section 15125 of the CEQA Guidelines, an EIR must include a description of baseline physical conditions by which a lead agency determines whether an impact caused by the proposed project is significant. The CEQA Guidelines define “baseline” as “the physical conditions in the vicinity of the project, as they exist at the time of the notice of preparation [of an EIR] is published, at the time environmental analysis is commenced, from both a local and regional perspective.” The Notice of Preparation (NOP) for the EIR was published in October 2010, after the 2008 Sesnon fire. Impacts from the Sesnon fire are not discussed as significant impacts in the EIR because these impacts would not be caused by the proposed project, and in fact took place before the baseline for the project was established (prior to the date of the NOP for the EIR). Per the requirements of CEQA, the EIR describes the Sesnon fire as a factor in the baseline conditions of the project area, and includes the conclusion that that the risk of fire hazard in the project area is extremely high.

For more information, refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR. Revisions were made to this section to include a description of the Sesnon fire, the safety record for the Aliso Canyon Natural Gas Storage Field facility, and fire measures that will be adopted in the EIR. Also refer to the Master Response to Comments About Fire Safety.

**B4-3:** Refer to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”), and response to comment B4-2.

**B4-4:** Refer to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”).

**B4-5:** Refer to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”).

**B4-6:** Refer to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”).

**B4-7:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project.

- B4-8:** Refer to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”).
- B4-9:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project.
- B4-10:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Refer to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”).



**B5 Scott Rucker, 5/22/2012**

Letter B5

May 22, 2012

STATE OF CALIFORNIA  
PUBLIC UTILITIES COMMISSION  
555 Van Ness Avenue  
San Francisco, Ca. 94102-3298

Proposed by Southern California Gas Company

Application # A.09-09-020

To: CPUC

I live on Browns Canyon Road Chatsworth Ca which is ½ mile over the hill from the Aliso Canyon SCGC facility.

B5-1

My life on October 12, 2008 was perfect. I had a beautiful ranch, grand children and dogs playing, fruit orchards, beautiful 100 year old oaks for shade, and a landscape out of Home and Garden. I had realized my dream.

Then on October 13, 2008 our dreams became a nightmare we would never forget. And maybe never survive especially in my case as I never came so close to death as I did that day.

On that day the fire roared through our canyon with my wife and grandson barely got out of the canyon with 50 foot flames to accompany her out of the canyon. My grandson to this day, as he was 1 year old on that day and now almost five, still thinks he will be burned in a fire. Thought his granddaddy and husband was just getting the dogs and leaving. But instead my family watched the TV as the news helicopters broadcast the fire and there was no sign that I was going to get out. I was trapped for over 7 hours defending our home with no water as the power was out and no fire department as they could not get in the canyon. I watched as my property was destroyed, 14 vehicles burned to the ground, which took my business with it. The property which we pain staking work so hard to create an oasis for family was gone. We now live with no potable water, temporary power, slopes that are slipping because all the oak trees were burned and are falling. Now after almost 4 years I do understand the term "GROUND ZERO" because I survived it and now live it.

In the almost 4 years since the Sesnon fire SCGC has not offered to help us. We are suing the SCGC for what they did. In my case I am learning that the fire was caused when a high voltage power line that was a part of SCGC Aliso Canyon facility fell and ignited the dry overgrown brush and trees below. There was no program of periodically inspecting and maintaining of the electric system. The electrical contractor testifies that he asked SCGC many times to allow him to do a careful inspection of the entire system, but they would not, saying that SCGC didn't

B5-2

have the money in the budget. NO ONE AT SCGC HAD ANY EXPERIENCE OR KNOWLEDGE ABOUT HIGH VOLTAGE POWERLINES. This expertise was available at its sister company, San Diego Gas and Electric, but SCGC management never called upon this expertise. The neglect is consistent with SCGC track record of non maintenance of their facility. As a result of this indifference to the risks to the public, my family and I are now suffering and all we worked for and our dreams are now just memories. And that is not living a dream.

B5-2  
Cont.

Now SCGC wants to build even more power lines and expand its gas facility. I believe SCGC has proven they can't be trusted with the risk it entails.

UNTIL SCGC RESOLVES THE DISASTER THEY CAUSED AND MAKES GOOD ON THE DAMAGE THE SESNON FIRE CREATED, SCGC SHOULD BE PUT ON PROBATION AND NOT ALLOWED TO BUILD OR RENOVATE THIS FACILITY SURROUNDED BY A RESIDENTIAL COMMUNITY.

B5-3

The fire in which I endured the challenge to fight the fire and to stay alive, which the investigations by your agency as well as every agency has agreed that the fire was started by SCGC and was on their property, and then moved though the communities to devastate more than 18,000 acres and the lives of the customers in the community where SCGC maintains the Aliso Canyon facility in Chatsworth California.

B5-4

Given the above scenario in which you will never feel the impact of the words until you are faced with a wall of fire almost 100 feet tall and the wind gusting with speeds of 105 mph and your duty is to defend this.

B5-5

Now it has been almost 4 years and everyone moves on except the people of the Sesnon fire. The canyons and all its surroundings are burnt beyond recognition and will never recover to the place on earth that was like a page out of travel brochure and all you wanted was to visit. Now all the people want, are to figure out how to get out of this GROUND ZERO that the SCGC has created for us and never even acknowledged our heartache.

I personally live in a home that is now inhabitable but I have nowhere to go or the financial where with all to change my situation. Do you think that the SCGC has ever offered anything to us to make us whole?

NO. But have they moved on with business as usual with this application in Sept. 2009 not even 10 months after the fire in Oct. 2008.

It is my position that this project that the SCGC has brought before the CPUC should have the language in it as follows. The notice says "NO PROJECT ALTERNATIVE" and I believe and follow the community's opinion that it should read. "NO PROJECT AT THIS TIME UNTIL SCGC DEMONSTRATES THAT IT HAS CONCERN FOR THE PUBLIC'S SAFETY"

B5-6

## BACKGROUND

The Aliso Canyon facility at the present time has capacity of 84 billion cubic feet of natural gas and would like to expand the capacities to over 124 billion cubic feet. Did anyone at the CPUC see the residential plan in which the SCGC is in the middle of 12500 homes with a build out of more than 3000 more homes? We could not protect the homes in the 2008 Sesnon fire, and the fire presence was non-existent in that fire. What makes us think now the situation will change with even more volatile conditions that with the new proposed transmission lines that we could defend against even larger fire.

B5-7

B5-8

SCGC avoidance of safety and maintenance responsibilities at the Aliso Canyon facility demonstrates at best, a complete lack of understanding of the dangerous nature of their operation, or much worse, a willingness to make trade-offs in operational expenses (brush clearance/line inspection costs) at the expense of neighboring community safety.

B5-9

The application A.09-09-020 SCGC Aliso Canyon facility project serves as more corroboration of a public utility that has completely missed the mark on public safety and its meaning. From application A.09-09-020, see the examples below that support this view.

B5-10

Application states, "project not subject to public notice requirements but SCGC voluntarily did so with 8" x 12" signs of notice of hearing 2 feet off the ground to solicit community input. Public documents and meetings never used the term "expansion or increased capacity", only "replacement". Granted this is not a safety issue, just more disingenuous SCGC behavior. Public notice also stated, "PEA (Pre-Environmental Assessment) concluded no significant environmental impacts as a result of the project." With no mention of the Sesnon fire. Burning up to 18,000 acres of land and trees is a significant environmental impact. Without improved safety and management practices at the site, past performance is all we have to go on.

B5-11

B5-12

Application A.09-09-020 requests preemption of local regulations with CPUC receiving preemptive authority, yet decides NOT TO COMPLY with the CPUC brush clearance and power line maintenance standards. Also does not want to meet local grading codes and oak tree protection requirements.

B5-13

Application A.09-09-020 states "no impact on the surrounding community that cannot be mitigated to a level below significant." Does this mean that SCGC considers the Sesnon fire below significant?

B5-14

Application states "no recreational or park land will be disturbed or otherwise affected "Any guarantees? Sesnon fire burned down the park lands.

B5-15

Application states "SCGC strong track record on maintenance efforts at Aliso Canyon facility." (The CPUC should request site maintenance logs for brush clearance and power line inspections)	B5-16
Application states SCGC formed a team in partnership with Southern California Edison. Two huge, independent agencies working together. How does conflict resolution place? How are we assured that no one will drop the ball in handoffs from one agency to another? Recipe for disaster. Besides, SCE DOES NOT DO BRUSH CLEARANCE IN THE CHATSWORTH TAP LINE. Also with the building department of the respective city and county's allowing SCGC to operate a facility with residential neighborhoods at their front door. Public Safety is present?	B5-17 B5-18 B5-19
Application states "SCGC does not believe that approval of this application will require hearings." SCGC, of course, ASSUMES safety and management competency. The public can not afford this assumption with the safety track record SCGC has, and has demonstrated with the Sesnon fire.	B5-20
Public outreach notices of application signage posted in the community were nonexistent and the showing of the public was an embarrassing amount due to the efforts of SCGC in promoting the town hall meeting. The area which has a population of over 3 million people drew 6 people to the public comment portion on May 3, 2012 at Porter Valley C/C. When asked why no one was notified both the CPUC and representatives for the EIR report had no comment. So in short us the public are getting the short end of the stick.	B5-21
PEA states "SCGC will incorporate measures for fire and detection in order to lower the risk of initiating wild land fires during construction". Based on SCGC track record how can we be certain?	B5-22
PEA states "SCE protocols will be in place for red flag warning days" How do we know these protocols will be followed and what about SCGC? What protocols do they have to follow?	B5-23
PEA states "fire risk will be low because construction areas would be grubbed of vegetation and graded". What about the new power line installation from the Chatsworth Tap (Newhall) to the facility? What about the oil wells and expedition that exists at the SCGC Aliso Canyon facility?	B5-24
Given the economic financial downturn with the closures of some of the public services such as Fire Departments and mutual aid for neighboring city fire departments. How the CPUC answer the question of PUBLIC SAFETY NOW when the SCGC could not ensure the public safety before.	B5-25
So with this track record I feel that the CPUC must recommend that the new transmission lines will be a direct burial line in order to re-enforce that the public is NOT in harm's way again considering that the Aliso Canyon facility is in a 10 fire zone rating in which that is the highest.	B5-26

As well, leading up to the Sesnon fire SCGC did not respect the nature of the business as well as the location of the facility. B5-27

Given the track record of SCGC Aliso Canyon facility management we believe they cannot be trusted to make decisions in the best interest of public safety. Therefore the public must impose safety requirements upon the facility. The CPUC should deny all SCGC Aliso Canyon facility expansions and upgrades applications until a complete investigation are completed to see IF SCGC HAS THE MANAGEMENT STAFF TO MANAGE A FACILITY OF THIS CAPACITY. B5-28

In closing I would like to plead with the commission to realize that this application is not as it appears, we need to broaden the scope of the investigation in regards to SCGC ability to manage and maintain this proposed facility. With that assumption in place if we are wrong we could end up with another San Bruno. The reason we bring that point to the surface is for the mirror fact that the above ground natural gas transmission lines were supported by wood pedestal prior to the Sesnon fire, and are still in service burned from the fire. How we justify this application for SCGC to expand this facility with these protocols in place to protect the public? B5-29  
B5-30

Also to further document are argument to have this application stopped is that we have documents we would like the CPUC to review in regards to SCGC Aliso Canyon facility which will prove beyond a conclusive opinion that SCGC does not and will not in the future have the ability to operate a facility of this capacity. B5-31

Scott and Michele Rucker

Dartagnan Riordan- Grandson

Survivors of the Sesnon fire

**B5 Scott Rucker, 5/22/2012**

- B5-1:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project.
- B5-2:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Refer also to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”), and response to comment B4-2.
- B5-3:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Refer also to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”), and response to comment B4-2.
- B5-4:** Refer to response to comment B4-2.
- B5-5:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Also refer to response to comment B4-2.
- B5-6:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Refer also to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”), and response to comment B4-2.
- B5-7:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Refer also to Master Response to Comments About Fire Safety (“Proximity of Residential Development to Aliso Canyon Natural Gas Storage Field Facility”).
- B5-8:** Refer to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”), revisions to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR, and response to comment B4-2.
- B5-9:** Refer to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”), and revisions to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR.
- B5-10:** Refer to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”).
- B5-11:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. The notices the commenter refers to were not part of the CPUC’s public notification procedures for the Draft EIR.
- B5-12:** Refer to response to comment B4-2.

- B5-13:** Refer to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”); revisions to EIR Sections 4.8, “Hazards and Hazardous Materials,” and 4.4, “Biological Resources, as presented in Appendix A of this Final EIR;” and response to comment O1-11.
- B5-14:** Refer to response to comment B4-2.
- B5-15:** Refer to Master Response to Comments About Fire Safety and response to comment B4-2.
- B5-16:** Refer to revisions to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR. On January 24, 2013, the CPUC requested records of fire safety violation reports (form LE-38, California Interagency Fire Safety Inspection Legal Notice) from SoCalGas and SCE, for the past five-year period. SoCalGas and SCE responded on February 7 and February 4, 2013, respectively, that during the past five-year period, neither company had been required to submit LE-38 (fire safety violation) forms for the Aliso Canyon Natural Gas Storage Field Facility or the SCE ROWs within the project area.
- B5-17:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR. Revisions were made to this section to include a discussion of fire safety measures to be implemented by both SoCalGas and SCE during construction and operation of the proposed project.
- B5-18:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR, and to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”).
- B5-19:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR, and to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility” and “Proximity of Residential Development to Aliso Canyon Natural Gas Storage Field Facility”).
- B5-20:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Also refer to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”), and response to comment B4-2.
- B5-21:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Town hall meetings conducted by SoCalGas for the proposed project occur independently and outside the scope of the CPUC’s CEQA process. See also response to comment P4-1.
- B5-22:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR, and to Master Response to Comments About Fire

- Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”).
- B5-23:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR, and to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”).
- B5-24:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR, and to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”). The infrastructure that would be installed within SCE’s ROW from the Chatsworth Substation to the Natural Substation consists of fiber optic (telecommunications) cable overbuilt on existing power line structures. Some of these structures may be replaced as part of the project. Areas along this ROW will be cleared of vegetation and graded as necessary during construction. Construction areas at the Aliso Canyon Natural Gas Storage Field would also be cleared of vegetation and graded as needed during construction. No new oil wells would be installed or removed as part of the proposed project.
- B5-25:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR, and to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”).
- B5-26:** Refer to Master Response to Comments About Underground Alternatives, and to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”).
- B5-27:** Refer to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”) and response to comment B4-2.
- B5-28:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Refer to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”).
- B5-29:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Refer to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”).
- B5-30:** Refer to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”) and response to comment B4-2.
- B5-31:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Refer to Master Response to Comments



About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”).

### **3.3.3 Comments Made by Organizations**

This section provides responses to comments about the Draft EIR received from organizations.

**O1 Southern California Edison, 5/22/2012**

**Herron, Christy**

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**From:** Christine.Mcleod@sce.com  
**Sent:** Tuesday, May 22, 2012 3:48 PM  
**To:** Herron, Christy  
**Subject:** SCE's Comments on the Draft Environmental Impact Report (SCH 2010101075) for the Aliso Canyon Turbine Replacement Project (A.09-09-020)  
**Attachments:** Telecom Route 4\_Map.jpg; Natural 66 kV SLD rev 3.pdf; SCE Comment Table - SCG Aliso Canyon CPCN - CPUC DEIR.pdf; SCE Comment Letter - May 22 2012 - SCG Aliso Canyon CPCN - CPUC DEIR.pdf; Telecom Route 4 Description .pdf

Dear E&E,  
Enclosed please find Southern California Edison Company's (SCE) submittal package on the Draft Environmental Impact Report (SCH 2010101075) for the Aliso Canyon Turbine Replacement Project (A.09-09-020).

Please do not hesitate to contact me at the phone numbers below if you have any questions. Thank you for the opportunity to comment.

Christine McLeod  
Project Manager - Regulatory Affairs  
Regulatory Policy & Affairs Dept.  
Southern California Edison  
2244 Walnut Grove Avenue, Quad 3D, 388L  
Rosemead, CA 91770  
Phone (626) 302-3947, Fax (626) 302-4332, Cell (626) 695-2787

Click [here](#) to report this email as spam.

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Letter O1

May 22, 2012

Aliso Canyon Turbine Replacement Project  
505 Sansome Street, Suite 300  
San Francisco, CA 94111  
Email: [AlisoCanyonNG@ene.com](mailto:AlisoCanyonNG@ene.com)

*Re: SCE's Comments on the Draft Environmental Impact Report (SCH 2010101075) for  
the Aliso Canyon Turbine Replacement Project (A.09-09-020)*

Dear Ladies and Gentlemen:

Enclosed please find Southern California Edison Company's (SCE) comments to the above-referenced Draft Environmental Impact Report (DEIR) circulated by the California Public Utilities Commission (CPUC) on April 4, 2012.

The majority SCE comments to the Southern California Gas Company (SCG) Aliso Canyon Turbine Replacement Project (Proposed Project) DEIR are in the enclosed comment table; however, SCE discusses two key concerns in this letter relating to the (i) Mitigation Monitoring Plan (MMP) and (ii) a minor scope addition to the Telecommunications Routes.

Mitigation Monitoring Plan:

The draft MMP does not clearly assign responsibility for compliance with Mitigation Measures (MMs) and Applicant Proposed Measures (APMs) and in some cases incorrectly assigns responsibility to either the applicant (So Cal Gas) and/or SCE for measures that should be assigned to the other utility. Accordingly, SCE recommends that the assignment of responsibility for compliance with the MMs and APMs be made either through a separate agreement among the Gas Company, SCE and the CPUC or through the Final Mitigation, Monitoring, Reporting, and Compliance Program (MMRCP).

O1-1

Telecommunications Routes:

Three telecommunications routes are discussed in the DEIR. However, in order for SCE to effectively interconnect the Natural Substation to the SCE system and provide the required subtransmission line protection, SCE has determined that the fiber optic ring associated with the Proposed Project needs to include an additional 5.5 mile fiber optic cable segment (to be called Telecommunications Route #4) from SCE's San Fernando Substation to the entrance to the Sunshine Canyon Landfill in Sylmar. A description of the route and a map are attached.

O1-2

P.O. Box 800  
2244 Walnut Grove Ave.  
Rosemead, CA 91770

Telecommunications Route #4 is anticipated to use existing<sup>1</sup> overhead SCE and Los Angeles Water & Power (LADWP) wood distribution poles and LADWP subtransmission wood poles and require short spans of underground construction. One new pole is anticipated to be required at a location near Sepulveda Boulevard and San Fernando Road.

O1-2  
Cont.

SCE anticipates that Telecommunications Route #4 construction requirements and impacts will be generally similar to those discussed in the DEIR for Telecommunications Segment #3, including Sections 2.2.9.1 (New Structures and Rights-of-Way), 2.2.10 (Access Roads), 2.3.1 (Construction Schedule, Personnel and Equipment), 2.3.3 (General Construction Methods and Materials), 2.3.10 (Reconductoring, Fiber Optic Cable Installation, and Structure Replacement), 2.3.1.3 (Staging Areas), 2.4.3 (Natural Substation, 66-kV Subtransmission Line, and Fiber Optic Cable Operations and Maintenance), and 2.5 (Plans and Applicant Proposed Measures).

O1-3

In addition, please note that the majority of the route for Telecommunications Route #4 has been evaluated by the CPUC in the DEIR due to the fact it follows a large portion of the same route as the DEIR's proposed Routing Alternative A (Sylmar Substation to San Fernando Substation), which the Draft EIR recommends as the Environmentally Superior Alternative.

O1-4

Because Routing Alternative A overlaps a significant portion of Telecommunications Route #4, Routing Alternative A would conflict with SCE's ability to maintain required diverse telecommunications paths. Accordingly, SCE respectfully requests the CPUC to eliminate Routing Alternative A from consideration because Routing Alternative A presents feasibility and operability concerns to SCE in that it would preclude SCE from having four separate, diverse fiber optic telecommunications paths required for the Proposed Project due to the significant route overlap with Telecommunications Route #4. SCE urges the CPUC to ensure the Proposed Project includes not only the newly identified Telecommunications Route #4 but also Telecommunications Route #3 (San Fernando Substation to Fiber Optic Connection Point) instead of Routing Alternative A.

O1-5

SCE understands the CPUC may wish to understand Telecommunications Route #4 more fully. SCE looks forward to working with the CPUC to provide any clarifying or more detailed information for inclusion in the Final EIR. While this presents a new segment scope to the telecommunications system, the addition is not likely to present any impacts not already evaluated in the DEIR.

O1-6

Thank you for your consideration of these comments. Please note that in addition to the accompanying comment table, SCE has included the following attachments:

O1-7

- Natural 66 kV Single Line Diagram
- Telecommunications Route #4 Description

<sup>1</sup> As discussed in the Draft EIR regarding Telecommunications Routes #2 and #3, while SCE anticipates that existing overhead poles would be used for Telecommunications Route #4, SCE would not be able to determine if any poles require replacement in order to attach the new fiber optic cables until final engineering and windloading tests have been completed.

- Telecommunications Route #4 Map

O1-7  
Cont.

Thank you for the opportunity to comment on the DEIR.

Sincerely,



Christine McLeod  
SCE Regulatory Affairs

cc: Nadia Aftab, So Cal Gas  
Albert Garcia, So Cal Gas  
Daniel Duke, SCE  
Beth Gaylord, SCE

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**ALISO CANYON**  
**DRAFT ENVIRONMENTAL IMPACT REPORT**  
**SCE COMMENTS & SUGGESTED REVISIONS – MAY 22, 2012**

Comment #	Section	Page	Comment	Suggested Revision	
1	Acronyms and Abbreviations	xv	<b>Acronym Table:</b> The acronym for megawatt-ampere is listed twice. Please remove "MVA" reference to this term, as it is incorrect.	<del>MVA megawatt-ampere</del>	O1-8
2	Executive Summary	ES-2	<b>Figure E-1 Legend:</b> depicts a yellow triangle for the proposed Natural Substation. However, the figure displays yellow triangles for both Natural and San Fernando Substations.	Please correct figure as appropriate.	O1-9
3	Executive Summary	ES-3	The second sentence of <b>Footnote 2</b> reads, "SCE estimates that 50 megawatts of electricity would be required to meet the increase in electrical demand from operation of the proposed electric-driven compressors..."  This refers to an estimate presumably provided by SCE. Please note that the estimated load was based on information provided by the applicant and not SCE.  The load estimate should be provided in MVA.	Please revise the second sentence in the footnote to read as follows:  "The <del>SCE</del> applicant estimates that <del>50 xx megawatts</del> MVA of electricity..."	O1-10

ALISO CANYON  
DRAFT ENVIRONMENTAL IMPACT REPORT  
SCE COMMENTS & SUGGESTED REVISIONS – MAY 22, 2012

Comment #	Section	Page	Comment	Suggested Revision	
4	Chapter 1 Introduction	1-4	<b>Lines 11-21:</b> This section does not accurately explain or cite CPUC General (GO) Order 131-D. Please amend this section to accurately characterize GO 131-D requirements.	Please revise as follows: Pursuant to Article XII of the California Constitution, the CPUC is vested with jurisdiction over this project. <del>The applicant and SCE would still be required to obtain all building, encroachment, and other ministerial (administrative) permits from local jurisdictions.</del> CPUC General Order 131-D, which establishes requirements for the <del>planning and construction</del> of certain electric facilities, <del>facilities for the generation and transmission of electricity.</del> General Order 131-D clarifies that local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or other electric facilities constructed by public utilities subject to the (CPUC's) jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters and obtain any non-discretionary local permits required for the construction and operation of these projects. <del>(requires the applicant and SCE to comply with local building, design, and safety standards to the greatest degree feasible to minimize project conflicts with local conditions. General Order 131-D also requires the CPUC to contact and coordinate with local planning agencies regarding land use concerns that could result from the proposed project.</del>	O1-11
5	Chapter 2 Project Description	Entire Section	Please refer to comments within the attached May 22, 2012 letter from SCE regarding revised telecommunications scope.		O1-12

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Comment #	Section	Page	Comment	Suggested Revision	
6	Chapter 2 Project Description	2-2	<b>Lines 2-4:</b> SCE's existing easement on property owned by the applicant will also need to be enlarged in order to construct and operate the 66 kV subtransmission lines. However, it is anticipated that any expansion of the easement would occur within the geographic boundary of the study area utilized in the DEIR, and would not create a new significant impact or a substantial increase in the severity of a previously identified significant impact.	In addition, the applicant would apply to the California Public Utilities Commission (CPUC) to enlarge SCE's existing easement on the storage field site, which would be necessary for SCE to construct and operate the Natural Substation, <u>and/or</u> 66kV transmission lines.	O1-13
7	Chapter 2 Project Description	2-11	<b>Footnote 4:</b> The reference to Segment C is incorrect. Segments A and B form the double circuit subtransmission line.	Please revise as follows: "Segments A and B form a double-circuit, alternating-current subtransmission line with six conductors (three conductors on each side of each structure supporting the line)..."	O1-14
8	Chapter 2 Project Description	2-22	<b>Lines 27-29</b> read, "Along Segment E, the existing 66-kV lines from MacNeil Substation to San Fernando Substation would be looped through the San Fernando Substation on new conductor to create the MacNeil-San Fernando No. 1 and MacNeil-San Fernando No. 2 66-kV subtransmission lines."	Please revise as follows: "Along Segment D and E, the existing Chatsworth-MacNeil-Newhall-San Fernando 66-kV lines from <del>MacNeil</del> Newhall Substation to <del>San Fernando</del> MacNeil Substation would be looped through the San Fernando Substation on new conductor in proximity to San Fernando Substation and <del>to</del> would create the new Natural-Newhall <del>MacNeil</del> San Fernando 66-kV subtransmission Line and the MacNeil-San Fernando <del>No. 1 and MacNeil-San Fernando No. 2</del> 66-kV subtransmission lines." Please see attached Figure to correct Figure 2-6 in the Draft EIR.	O1-15

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Comment #	Section	Page	Comment	Suggested Revision	
9	Chapter 2 Project Description	2-20	<b>Lines 10-11:</b> Please note minor technical revision.	Please revise as follows: SCE would provide two bidirectional 64-kilobit-per-second digital channels (C37.94) for each new 66-kV line terminal.	O1-16
10	Chapter 2 Project Description	2-22	<b>Line 36-38:</b> As SCE has thus far only completed preliminary engineering, the exact number of TSPs at/near San Fernando Substation is not yet confirmed. Consistent with Table 2.2 Footnote (b), the exact number of TSPs to be installed will be determined during final engineering. The potential range for TSPs to be installed at/near San Fernando Substation may range between 3 and 6.	Please consider using a range of TSPs and update applicable sections accordingly.	O1-17
11	Chapter 2 Project Description	2-23	Under the section heading <b>2.2.7.1 New Conductor</b> , <b>Table 2-2</b> shows Segment A/B length/structures as the Segment C length/structures, and vice versa.	Please correct segment labels in first column.	O1-18

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Comment #	Section	Page	Comment	Suggested Revision	
12	Chapter 2 Project Description	2-22	<b>Lines 23-30:</b> Please note minor technical revision.	Please revise as follows: “The line from Newhall Substation to San Fernando Substation, which includes Segments B and D, would be called the <u>MacNeil-Newhall-San Fernando-66-kV Subtransmission Line</u> . Along Segment E, <del>the one existing 66-kV lines from MacNeil Substation to San Fernando Substation would be looped through the San Fernando Substation on new conductor to create the MacNeil-San Fernando 66-kV Subtransmission Line No. 1 and the MacNeil-San Fernando No. 2 66-kV Subtransmission Lines</del> . The length of each 66-kV segment and the number of structures to be replaced are provided in Table 2-2.”	O1-19
13	Chapter 2 Project Description	2-25	On <b>Table 2-3, Row 42 Column ‘Existing Type’</b> reads, “LWS/H-frame (2 Poles).” Structure No. 42 is now a three-pole structure.	Please add the following Structure ID Number to Row 42 and revise type description: <u>4513741E</u>	O1-20
14	Chapter 2 Project Description	2-26	On <b>Table 2-3, Row 43</b> , Structure No. 43 has been removed from the subtransmission design.	Please remove Structure accordingly.	O1-21

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Comment #	Section	Page	Comment	Suggested Revision	
15	Chapter 2 Project Description	2-26	On <b>Table 2-3, Row 44</b> , the Structure ID Numbers for Structure No. 44 are inaccurate.	Please revise as follows: <del>4476889E, 4476890E, 4476891E</del> 4539201E, 4539202E, 4539203E	O1-22

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Comment #	Section	Page	Comment	Suggested Revision
16	Chapter 2 Project Description	2-26 and 2-27	<p><b>Lines 13 – 16 (page 2-26) through Lines 1-3 (page 2-27):</b> Please note, a portion of SCE's Chatsworth MacNeil-Newhall-San Fernando 66 kV Subtransmission Line may be relocated under a separate project (Sunshine Gas Producers Renewable Energy Project), which involves the construction of a gas turbine electrical generation facility at the Sunshine Canyon Landfill and for which SCE will install new 66 kV interconnection facilities. The Sunshine Gas Producers Renewable Energy Project, was approved by the South Coast Air Quality Management District (SCAQMD) in April 2012 (Final Supplemental Environmental Impact Report (FSEIR), State Clearinghouse No. 92041053).</p> <p>In the event that the Sunshine Gas Producers Renewable Energy Project is constructed prior to the separate relocation project requested by the Sunshine Canyon Landfill, a portion of the proposed relocation in the landfill associated with the Sunshine Gas Producers Project will be constructed by SCE, exempt from CPUC Permit to Construct requirements, pursuant to CPUC GO 131-D, Section III.B.1.f. <del>The proposed relocation will be evaluated pursuant to CEQA separately from this EIR.</del> SCE has stated that if the landfill relocation project or the renewable generator interconnection project does not occur or if the separate projects occurs after construction of the Aliso Canyon Turbine Replacement Project, reconductoring and structure replacement for Segment C would follow the existing alignment across the landfill (SoCalGas 2009). The Sunshine Canyon Landfill Project and the Sunshine Gas Producers Renewable Energy Project is are further discussed in Chapter 6, "Cumulative Impacts and Other CEQA Considerations."</p>	<p>Please revise as follows:</p> <p><del>Relocation of the subtransmission line would require approval by the CPUC. SCE anticipates filing with file a separate Permit to Construct application with the CPUC, which the CPUC will evaluate pursuant to CEQA separate from this EIR, for the relocation of all or a portion of the subtransmission line segment across Sunshine Canyon Landfill. However, a portion of the subtransmission line may be relocated under a separate project related to the interconnection of the Sunshine Gas Producers Renewable Energy Project, which has been evaluated pursuant to CEQA by the South Coast Air Quality Management District (SCAQMD) in April 2012 (Final Supplemental Environmental Impact Report (FSEIR), State Clearinghouse No. 92041053). In the event that the Sunshine Gas Producers Renewable Energy Project is constructed prior to the separate relocation project requested by the Sunshine Canyon Landfill, a portion of the proposed relocation in the landfill associated with the Sunshine Gas Producers Project will be constructed by SCE, exempt from CPUC Permit to Construct requirements, pursuant to CPUC GO 131-D, Section III.B.1.f. <del>The proposed relocation will be evaluated pursuant to CEQA separately from this EIR.</del> SCE has stated that if the landfill relocation project or the renewable generator interconnection project does not occur or if the separate projects occurs after construction of the Aliso Canyon Turbine Replacement Project, reconductoring and structure replacement for Segment C would follow the existing alignment across the landfill (SoCalGas 2009). The Sunshine Canyon Landfill Project and the Sunshine Gas Producers Renewable Energy Project is are further discussed in Chapter 6, "Cumulative Impacts and Other CEQA Considerations."</del></p>

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Comment #	Section	Page	Comment	Suggested Revision	
17	Chapter 2 Project Description	2-27	<b>Lines 22-25:</b> Minor revisions to text recommended to clarify scope of work within San Fernando Substation.	Please revise as follows:  Within the footprint of the existing San Fernando Substation, <del>four</del> <b>two</b> 66-kV circuit breakers, <del>four</del> <b>two</b> sets of disconnect switches, and associated equipment would be installed for the proposed 66-kV reconductoring work to create <del>two</del> <b>one</b> new positions on the existing switchrack, and would require ground-disturbing activities.	O1-24
18	Chapter 2 Project Description	2-27	<b>Line 47:</b> The fiber optic line associated with Telecommunication Route #1 will be overbuilt and not underbuilt as the DEIR indicates.	Please revise as follows:  Telecommunications Route #1 would consist of the installation of a new fiber optic cable on new structures ( <del>underbuilt</del> ) ( <b>overbuilt</b> ) along 66-kV Segments A, B, and C between Newhall Substation and the proposed Natural Substation.  Please also revise Chapter 4.1 as appropriate to account for an overbuild of the fiber optic line.	O1-25
19	Chapter 2 Project Description	2-28	<b>Lines 8-12:</b> Minor text revisions recommended clarifying routing of Telecommunications Route #3.	Please revise as follows:  Telecommunications Route 3 would consist of the installation of a new fiber optic cable on existing overhead SCE and Los Angeles Department of Water and Power (LADWP) wood poles and in new underground conduit and structures, from the San Fernando Substation east to tap an existing fiber optic cable within the ROW of an existing SCE 220-kV subtransmission line corridor.	O1-26
20	Chapter 2 Project Description	2-30	<b>Lines 12-14:</b> Minor text revisions recommended clarifying routing of Telecommunications Route #3.	Please revise as follows:  Fiber optic cable would be installed overhead on existing SCE and LADWP wood poles except for approximately 1200 feet that would be installed in new underground conduit and structures (Figure 2-8).	O1-27



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Comment #	Section	Page	Comment	Suggested Revision	
21	Chapter 2 Project Description	2-30	Line 17: Minor text revisions to correct typo related to line voltage.	Please revise as follows: SCE's San Fernando Substation, and approximately 200 feet of this route, which would be within SCE's existing <del>200-kV</del> 220-kV ROW in Sylmar	O1-28
22	Chapter 2 Project Description	2-30	Lines 25-27: Minor text revisions recommended clarifying routing of Telecommunications Route #3.	The cable would be installed overhead for approximately 300 feet southwest along the north side of McClay Street to an LADWP pole where it would transition down the pole and be installed <del>entirely</del> in new underground conduit.	O1-29
23	Chapter 2 Project Description	2-30	Footnote 9: Minor addition to text recommended to clarify the easement acquisition needed for the Gavin Distribution Line Extension Project.	Please revise as follows: The proposed Gavin Distribution Line Extension Project is scheduled for completion before construction of the Natural Substation would commence (Chapter 6, "Cumulative Impacts and Other CEQA Considerations") and would be addressed in accordance with SCE tariff rules and subject to the Gas Company granting SCE an easement pursuant to authorization under CPUC Code Section 851	O1-30
24	Chapter 2 Project Description	2-31	Lines 1-2: Minor text revisions recommended clarifying routing of Telecommunications Route #3.	The cable would continue overhead southeast along the alley for approximately 1,100 feet and then approximately 430 feet southwest along San Fernando Mission Boulevard to an SCE pole.	O1-31

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25	Chapter 2 Project Description	2-31	<b>Lines 19-21:</b> In order to accommodate two-way traffic to and from the proposed Natural Substation site, it has been determined that the width of the existing road would need to be increased to 24 feet, rather than 18 feet as stated in the DEIR.	Please revise as follows: The existing 1,500-foot dirt road to the proposed Natural Substation site would be modified, graded, and paved (Figure 2-2). Its width would be increased from 12 to <del>18</del> <u>24</u> feet. The road extends from an existing wellhead site at the storage field. Please update Table 2-7, Land Disturbance, consistent with this suggested revision.	O1-32
26	Chapter 2 Project Description	2-36	<b>Footnote e:</b> Text revision recommended in order to build in flexibility based on field conditions related to location of wire pulling, splicing, and tensioning locations.	Please revise as follows: Wire-pulling, tensioning, and splicing locations would be sited <del>no more than</del> <u>approximately every 6,000 feet</u> along the 66-kV subtransmission line reconductoring and fiber optic cable installation routes.	O1-33
27	Chapter 2 Project Description	2-44	<b>Line 43:</b> Minor text revision recommended to reflect accurate curing time for concrete mix.	Please revise as follows: The concrete mix typically used by SCE takes 20 <del>working</del> <u>days</u> to cure to an engineered strength.	O1-34
28	Chapter 2 Project Description	2-44	<b>Line 30:</b> Minor text revision recommended to clarify the timing for adding mud slurry.	Please revise as follows: If this is the case, <del>the applicant</del> <u>SCE</u> would add mud slurry into the borehole <del>after</del> <u>during</u> drilling to prevent the sidewalls from sloughing.	O1-35

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29	Chapter 2 Project Description	2-45	<b>Line 10:</b> Minor text revision recommended to clarify process for assembly of TSPs	Please revise as follows: Occasionally, TSPs may be ordered in three sections or more, if needed, to reduce the weight or length of sections to be installed in constrained access areas.	O1-36
30	Chapter 2 Project Description	2-46	<b>Line 34:</b> Recommended text addition to clarify that restoration would restore wire pull locations to their previous condition or to the conditions agreed to with the land owner.	Please revise as follows: The wire-pull locations would be temporary and the land would be restored to its previous condition or to the conditions agreed to with the landowner following completion of pulling and splicing activities.	O1-37
31	Chapter 2 Project Description	2-47	<b>Line 2:</b> Minor text revision to clarify that conductor material would not be transported from Pardee Substation.	Please revise as follows: Helicopter staging ( <del>loading helicopters with conductor materials</del> ) would take place at SCE's Pardee Substation.	O1-38
32	Chapter 2 Project Description	2-49	<b>Lines 41-42</b> read, Please note - SCE's Northern Transmission/Substation Regional Facility at Pardee Substation in Santa Clarita may not be the primary staging area.	Please revise as follows: <del>The primary</del> One of the staging areas for the 66-kV subtransmission line reconductoring would be SCE's Northern Transmission/Substation Regional Facility at Pardee Substation in Santa Clarita.	O1-39

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Comment #	Section	Page	Comment	Suggested Revision	
33	Chapter 2 Project Description	2-53	<b>Lines 13-14 read,</b> "The reductored 66-kV subtransmission lines would be maintained consistent with CPUC General Orders 95 and 165."  Text revision recommended to clarify that SCE will conduct routine patrols as part of ongoing operations and maintenance activities.	Please revise as follows:  "The reductored 66-kV subtransmission lines would be <u>routinely</u> <u>patrolled</u> and maintained consistent with CPUC General Orders 95 and 165."	O1-40
34	Chapter 2 Project Description	2-62 and 2-63	<b>Approval/Consultation Requirement under the State and Local Headings:</b>  Minor text clarification to cite appropriate section of Clean Water Act and typo within the "purpose" column.  Recommend removing this requirement under the "local" heading as it is not a local permit.	Please revise as follows:  <b>Approval/Consultation Requirement.</b> Section 401.402 of the Federal Clean Water Act, National Pollutant Discharge Elimination System General Permit for Discharge of Construction Related Storm Water  <b>Purpose.</b> As directed by State Water Resources Control Board, monitor development and implementation of Stormwater Pollution Prevention Plans and other aspects of the National Pollutant Discharge Elimination System permit and 401 certification program. SWPPPs are required for storm water discharges associated with construction activities that disturb more than one acre of land.	O1-41
35	Chapter 3 Description of Alternatives	3-7	Please refer to comments within the attached May 22, 2012 letter from SCE regarding revised telecommunications scope.		O1-42

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36	Chapter 4.1 Aesthetics	4.1-7 et seq.	Under the heading <b>Regional and Local</b> , please clarify that all references to local land use regulations are included for informational purposes only.	Please insert the following language under the heading <b>Regional and Local</b> : “CPUC General Order 131-D explains that local land use regulations would not apply to the Proposed Project. However the following are included for informational purposes only.”  Please also revise all references in the General Plans discussed in the Regional and Local section to clarify they are being provided for reference only and that they do not “apply to” the Proposed Project.	O1-43
37	Chapter 4.1 Aesthetics	4.1-26 To 4.1-31	Please note: The fiber optic line associated with Telecommunication Route #1 will be <u>overbuilt</u> and not underbuilt as the DEIR indicates.	Please conform the text to be consistent with the figures representing that the line will be overbuilt. See figures in Chapter 2 and Key Viewpoints in 4.1.	O1-44

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Comment #	Section	Page	Comment	Suggested Revision	
38	Chapter 4.1 Aesthetics	4.1-31	<p><b>Line 35:</b> Please note: Consistent with Section 2.2.7.2 of the DEIR Project Description, SCE would file the necessary FAA Form 7460 for structures (poles/towers/conductors) that exceed notification requirements outlined in FAA Part 77. SCE would file the form upon completion of final engineering and prior to construction per FAA Part 77. All FAA recommendations, including the lighting of TSPs will be implemented into the design of the project if necessary.</p>	Please consider potential lighting of TSPs resulting from FAA consultation throughout Chapter 4	O1-45

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39	Chapter 4.3 Air Quality	Entire Section	<p>Please note: The Chatsworth Substation and portions of Telecommunications Route #2 are located in Ventura County. Work done in these areas is therefore under the jurisdiction of the Ventura County Air Pollution Control District (VCAPCD). The Air Quality section of the DEIR only takes into consideration the rules, regulations and thresholds established by the South Coast Air Quality Management District (SCAQMD). Typically, if a linear project crosses through multiple Air Basins, the impacts to each Air Basin are analyzed independently. In this way, the emissions generated in each Air Basin can be compared to the threshold set forth by each respective Air District. Furthermore, the rules and regulations within the jurisdiction of VCAPCD may differ from those of SCAQMD.</p>	SCE recommends that emissions generated in the Ventura County Air Basin be compared to the applicable rules, regulations and thresholds set forth by the VCAPCD, and the Impact Analysis be updated throughout Chapter 4.	O1-46
40	Chapter 4.2 Agriculture and Forestry Resources	4.2.3	Under the heading <b>Regional and Local</b> , please clarify that all references to local land use regulations are included for informational purposes only.	<p>Please insert the following language under the heading <b>Regional and Local</b>:</p> <p>“CPUC General Order 131-D explains that local land use regulations would not apply to the Proposed Project. However the following are included for informational purposes only.”</p>	O1-47

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Comment #	Section	Page	Comment	Suggested Revision
41	Chapter 4.3 Air Quality	4.3-9	<b>Lines 8-10:</b> Please note, SCE will utilize unpaved access roads for portions of the subtransmission and telecommunications line construction.	SCE recommends that the text be revised accordingly within the description on page 4.3-9 and emissions calculations in Appendix H be updated to account for any travel on unpaved roads. In addition, the Impact Analysis in Chapter 4 should be updated accordingly.

O1-48



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Comment #	Section	Page	Comment	Suggested Revision	
42	Chapter 4.4 Biological Resources	4.4.35 and 4.4- 53 – 4.4.54	<p><b>Significant Ecological Area Discussion:</b> Please note, Los Angeles County Significant Ecological Areas (SEA), which are designated by the County General Plan and which require conditional use permit review for development within an SEA unless exempt, are preempted by CPUC General Order 131-D. Therefore, SCE is not subject to Los Angeles County/SEATAC permitting. Please also note that the CPUC has affirmed this in its Final EIR issued for the Tehachapi Renewable Transmission Project.</p> <p>For example, the CPUC's TRTP Final EIR Biological Resources Section notes as follows in the discussion about SEAs: <i>"The CPUC has preemptive jurisdiction over construction, maintenance, and operation of public utilities in California (CPUC's General Order Number 131-D)... Therefore, no local discretionary permits (e.g. Conditional Use Permits or Specific Plan approval) or local plan consistency evaluation is required for the proposed Project or the Project alternatives. However, SCE would be required to obtain all ministerial building and encroachment permits from local jurisdictions (counties and incorporated cities)." In addition, the CPUC's TRTP Final EIR Appendix H (Response to Comments) states as follows: "Thank you for your comment. The Lead Agencies recognize that this area is in a Significant Ecological Area (SEA). However, the CPUC has preemptive jurisdiction over the construction, maintenance, and operation of public utilities in California. Therefore, no local discretionary permits, such as a SEA Conditional Use Permit, are required. This area was considered generally in the analysis along with other sensitive areas..."</i></p>	Please revise the analysis throughout the Biological Resources Section with respect to all references to SEAs to clarify SCE is not subject to local discretionary permitting for its construction within Los Angeles County SEAs.	O1-49

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43	Chapter 4.5 Cultural Resources	4.5-11	Under the heading <b>Local</b> , please clarify that all references to local land use regulations are included for informational purposes only.	Please insert the following language under the heading <b>Local</b> : “CPUC General Order 131-D explains that local land use regulations would not apply to the Proposed Project. However the following are included for informational purposes only.”	O1-50
44	Chapter 4.8 Hazards and Hazardous Materials	4.8-12 and 4.8-31	<b>Lines 24 – 41 (page 4.8-12) and Lines 1- 19 (page 4.8-31):</b> Electric and Magnetic Fields are non-CEQA issues. SCE respectfully requests it to be moved to a separate chapter of the EIR. Further, EMF is not a hazard in the context of CEQA.	EMF is not a hazard in the context of CEQA. If the CPUC wishes to have a discussion of this non-CEQA issue, SCE respectfully requests it be included in a separate chapter of the EIR.	O1-51
45	Chapter 4.8 Hazards and Hazardous Materials	4.8-12	<b>Lines 35-36:</b> The word “mitigation” in this line is typically used only to describe environmental impacts under CEQA. Revision suggested to clarify that “EMF reduction measures” be implemented.	Please revise as follows: The decision directed utilities to use a 4 percent benchmark for low cost <del>mitigation</del> EMF reduction measures.	O1-52
46	Chapter 4.8 Hazards and Hazardous Materials	4.8-17 and 18	<b>Lines 49 – 2:</b> Minor text revision to correct typo	Wood waste, including wooden utility poles, may have been treated with <del>pesticide</del> preservatives to protect the wood during use. Because these preservative <del>pesticide</del> treatments could leach into water supplies when disposed of, Section 25150.7 was developed to restrict how and where treated wood waste could be disposed.	O1-53

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47	Chapter 4.8 Hazards and Hazardous Materials	4.8-24	<b>Table 4.8-5, Proposed 66 kV subtransmission line reductoring route, "Hazardous Materials and Wastes Used or Generated During Proposed Project Construction"</b>  In some cases the wood poles would be removed in their entirety. Suggest adding wood poles to the list of materials in this cell.	Please revise as follows:  Fuels, concrete, minor vehicle maintenance, and other construction materials. Waste soil, wood poles, and scrap steel from old <del>structures</del> poles.	O1-54
48	Chapter 4.8 Hazards and Hazardous Materials	4.8-30	<b>Lines 42-46.</b> SCE is not required to develop and implement operational SWPPPs for substations or linear operations. Suggested revision to eliminate any reference to SWPPPs for SCE substations.	Please revise as follows:  In addition to these plans, procedures, and measures, the applicant's <del>and SCE's</del> existing site-specific Hazardous Material Business Plans, SPCC Plans and SWPPPs address hazardous materials and waste storage, handling, and emergency procedures for proposed project activities at the storage field. SCE's existing site-specific Hazardous Material Business Plans, SPCC Plans, and standard SCE operating procedures would address hazardous material storage and use, and specify protective measures, notifications, and clean-up requirements for accidental spills or other releases of hazardous material that could occur at existing substations and other proposed project components as applicable.	O1-55
49	Chapter 4.8 Hazards and Hazardous Materials	4.8-33	<b>Lines 19-22 Impact HZ-1:</b> Please note, SCE does not maintain SWPPPs for "operational activities."	Please revise as follows:  During both construction and operation activities, hazardous materials and wastes... listed in the applicant <del>and SCE's</del> SWPPPs, SPCC Plans, and Hazardous Materials Management Programs.	O1-56

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Comment #	Section	Page	Comment	Suggested Revision	
50	Chapter 4.8 Hazards and Hazardous Materials	4.8-36	<b>Lines 3-8:</b> Please note, SCE does not maintain operational SWPPPs. Suggest revising narrative to eliminate implication that SCE would maintain an operational SWPPP for its facilities.	In addition to these plans, procedures, and measures, the applicant's <del>and SCE's</del> existing site-specific Hazardous Material Business Plans, SPCC Plans and SWPPPs address hazardous materials and waste storage, handling, and emergency procedures for proposed project activities at the storage field. SCE's existing site-specific Hazardous Material Business Plans, SPCC Plans, and standard SCE operating procedures would address hazardous material storage and use, and specify protective measures, notifications, and clean-up requirements for accidental spills or other releases of hazardous material that could occur at existing substations and other proposed project components as applicable.	O1-57
51	Chapter 4.8 Hazards and Hazardous Materials	4.8-38	<b>Line 15-18:</b> Minor text revisions to clarify the location of poles at the Sunshine Canyon Landfill.	Please revise text as follows: The tubular steel poles installed as part of this component would be installed <del>at elevation</del> on the edges of the Sunshine Canyon Landfill disposal areas, and the conductor would span the facility; therefore, no earth-moving activity would occur within the disposal areas of the Sunshine Canyon Landfill itself....	O1-58
52	Chapter 4-9 Hydrology and Water Quality	4.9-4	<b>Lines 9-15:</b> Minor text revisions to clarify description of TSP installation.	Please revise as follows: The net number of poles and support structures that could be installed as part of the 66-kV subtransmission line reconductoring (78) <del>would</del> could be greater than the number of existing structures (64); however, the existing structures, largely lattice steel towers, are generally supported on two or more <del>poles</del> legs and <del>concrete pads</del> <del>may</del> be encased in concrete and the new, single-pole TSP structures would represent a net decrease in impervious area for this project component.	O1-59

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Comment #	Section	Page	Comment	Suggested Revision	
53	Chapter 4-9 Hydrology and Water Quality	4.9-12	<b>Lines 1-9:</b> Please note, SCE is not required to prepare and implement all of the plans listed in the bulleted items. For example, SCE typically does not prepare nor implement a Compressor Maintenance Plan, Storm Water Pollution Prevention Plan (for operations), nor a Hydrostatic Test Water Management Plan.	Please revise as follows: Plans that have been or will be prepared by the applicant and/or SCE that will include measures addressing hydrology and water quality in the proposed project area include the following:	O1-60
54	Chapter 4-9 Hydrology and Water Quality	4.9-15	<b>Line 36-38:</b> Please note, some locations along the 66 kV subtransmission line route may require extensive grading. However, it is anticipated that all grading activities would occur within the geographic boundary of the study area utilized in the DEIR, and would not create a new significant impact.	Please revise as follows: The proposed 66-kV subtransmission line modifications <del>would</del> <del>not</del> require extensive grading or surface alteration around the TSP sites or along public roads but, <del>because</del> construction would occur along <del>with</del> existing transmission routes within the geographic boundary of the study area utilized in this DEIR, <del>and easements</del> .	O1-61
55	Chapter 4.10 Land Use and Planning	4.10-2	<b>Lines 23 – 26:</b> Please refer to SCE's earlier comments in this table regarding Project Description Section Pages 2-26 and 2-27 for clarification about the two separate projects requiring relocation of SCE's 66 kV line within the landfill.	Please clarify as appropriate.	O1-62

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Comment #	Section	Page	Comment	Suggested Revision
56	Chapter 4.10 Land Use and Planning	4.10-20 – 4.10-24 –	Lines 25-36 (page 4.10-20), Lines 21-22 and 41-43 (page 4.10-21), Lines 11-12 (page 4-22), Lines 5-6, and 16-17 (page 4.10-23), and Line 1 (page 4-24):  Due to the preemptive authority of CPUC General Order 131-D, none of the Area Plans, General Plans, Community Plans, or Ridgeline and Hillside Ordinances “apply to” the Proposed Project.	Please revise the discussion and analysis to remove any presumption of applicability of these plans or zoning ordinances, and note they are instead being provided for information only.

O1-63

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Comment #	Section	Page	Comment	Suggested Revision
57	Chapter 4.10 Land Use and Planning	4.10-20	<p><b>Significant Ecological Area Discussion:</b> Please note, Los Angeles County Significant Ecological Areas (SEA), which are designated by the County General Plan and which require conditional use permit review for development within an SEA unless exempt, are preempted by GO 131-D. Therefore, SCE is not subject to Los Angeles County/SEATAC permitting. Please also note that the CPUC has affirmed this in its Final EIR issued for the Tehachapi Renewable Transmission Project.</p> <p>For example, the CPUC's TRTP Final EIR Biological Resources Section notes as follows in the discussion about SEAs: <i>"The CPUC has preemptive jurisdiction over construction, maintenance, and operation of public utilities in California (CPUC's General Order Number 131-D)... Therefore, no local discretionary permits (e.g. Conditional Use Permits or Specific Plan approval) or local plan consistency evaluation is required for the proposed Project or the Project alternatives. However, SCE would be required to obtain all ministerial building and encroachment permits from local jurisdictions (counties and incorporated cities)."</i> In addition, the CPUC's TRTP Final EIR Appendix H (Response to Comments) states as follows: <i>"Thank you for your comment. The Lead Agencies recognize that this area is in a Significant Ecological Area (SEA). However, the CPUC has preemptive jurisdiction over the construction, maintenance, and operation of public utilities in California. Therefore, no local discretionary permits, such as a SEA Conditional Use Permit, are required. This area was considered generally in the analysis along with other sensitive areas..."</i></p>	Please revise the analysis throughout the Land Use Section with respect to all references to SEAs to clarify SCE is not subject to local discretionary permitting for its construction within Los Angeles County SEAs.

01-64

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Comment #	Section	Page	Comment	Suggested Revision
58	Chapter 4.11 Noise	4.11-11	<p><b>Lines 4-11:</b> The Chatsworth Substation and portions of Telecommunications Route #2 are located in Ventura County. Work done in these areas is therefore under the jurisdiction of the Ventura County. The County of Ventura General Plan Noise Section Policy 2.16.2 – 1. – (5) (2010) states:</p> <p>“Construction noise shall be evaluated and, if necessary, mitigated in accordance with the County Construction Noise Threshold Criteria and Control Plan.”</p> <p>Contrary to the statement in the DEIR (lines 10-11), Ventura County does in fact have construction noise thresholds.</p>	<p>Please revise Lines 7-11 as follows:</p> <p>The General Plan also requires noise-sensitive projects located within the CNEL 60 or 65 contour of any roadway, railroad, airport, or industrial use to conduct an acoustical site analysis and noise control specification. The Noise Ordinance limits “loud or raucous noise” 50 feet from the property line in residential areas from 9 p.m. to 7 a.m.</p> <p><del>This Noise Ordinance does not mention requirements related to construction noise or vibration.</del></p> <p>In addition, please incorporate the applicable Ventura County General Plan Noise Section Policy 2.16.2 – 1. – (5) into the analysis in Chapter 4.</p>

O1-65



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Comment #	Section	Page	Comment	Suggested Revision	
59	Chapter 4.11 Noise	4.11-22	<p><b>Lines 26 – 29:</b> SCE believes that the noise analysis is flawed because the analysis failed to take into consideration the following for the Natural Substation (paragraph lines 15-34):</p> <p>In accordance with the National Electrical Manufacturers Association (NEMA) Standards Publication No. TR 1-1993 (R2000), the design sound level of each 66/12 kV transformer bank would not exceed 74 dBA. This 74 dBA sound level represents the transformer banks' average design sound pressure level, defined in NEMA Standards Publication No. TR 1-1993 (R2000) and ANSI/IEEE Standard C57.12.90-2010.</p> <p>The transformer banks will be purchased consistent with SCE Specification AI-2009, which requires the transformer banks' sound pressure level to be at least 6 decibels below the 74 dBA design sound pressure level specified in NEMA Standards Publication No. TR 1. As a result, the highest average sound pressure level for each transformer bank is expected not to exceed 68 dBA.</p> <p>Using the calculation methodology outlined in the ANSI/IEEE Standard C57.12.90-2010, the calculated sound power level for each new No. 1 transformer bank would be 84 dBA. Assuming a 10 dBA noise reduction at the perimeter block wall at 10 feet distance from the transformers, the calculated combined sound pressure level of the two transformer banks would be 70 dBA at the substation's perimeter.</p> <p>The closest residential receptor is located approximately at 3,320 feet from the proposed substation site. Using the same calculation methodology, the combined sound pressure level of the two transformer banks would be 19 dBA at this location. This 19 dBA noise level would be significantly lower than the existing background noise levels at that location.</p>	Please revise Noise Analysis as appropriate based on the information provided in the comment.	O1-66

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60	Chapter 4.13 Public Services and Utilities	4.13-14	Under the heading <b>Regional and Local</b> , please clarify that all references to local land use regulations are included for informational purposes only.	<b>Suggested Revision</b> Please insert the following language under the heading <b>Regional and Local</b> : “CPUC General Order 131-D explains that local land use regulations would not apply to the Proposed Project. However the following are included for informational purposes only.”	O1-67
61	Chapter 4.14 Recreation	4.14-4	Under the heading <b>Regional and Local</b> , please clarify that all references to local land use regulations are included for informational purposes only.	<b>Suggested Revision</b> Please insert the following language under the heading <b>Regional and Local</b> : “CPUC General Order 131-D explains that local land use regulations would not apply to the Proposed Project. However the following are included for informational purposes only.”	O1-68
62	Chapter 4.15 Transportation and Traffic	4.15-9	Under the heading <b>Regional and Local</b> , please clarify that all references to local land use regulations are included for informational purposes only.	<b>Suggested Revision</b> Please insert the following language under the heading <b>Regional and Local</b> : “CPUC General Order 131-D explains that local land use regulations would not apply to the Proposed Project. However the following are included for informational purposes only.”	O1-69
63	Chapter 5 Comparison of Alternatives		Please refer to comments within the attached May 22, 2012 letter from SCE regarding revised telecommunications scope.		O1-70
64	Chapter 6 Cumulative Impacts	6-1	<b>Line 45:</b> Minor text revision to correct typo	<b>Suggested Revision</b> Please revise as follows: This table does not include all projects that would contribute to cumulative impacts along with the proposed project; rather, it includes a number of concurrent projects in the area to demonstrate the scope and nature of development in <del>Riverside</del> Los Angeles County.	O1-71

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Comment #	Section	Page	Comment	Suggested Revision	
65	Chapter 6 Cumulative Impacts	6-3	<b>Table 6-1:</b> Please note updated information for various projects listed in the table.	<p>Please revise the "Environmental Review" and "Construction Schedule" columns for the following projects:</p> <p>Project A7 – Expansion of the landfill approved in 2009 (Cipley 2011). <u>CPUC SCE Permit to Construct application for relocation of 66-kV subtransmission line <del>is</del> <del>project</del> anticipated to be filed at the CPUC by fall 2012.</u></p> <p>Project A8 – SCE would complete the Gavin Distribution Line Extension <u>prior to separate from (and potentially prior to) starting construction of the proposed Natural Substation.</u> and subject to the Gas Company granting SCE an easement pursuant to authorization under CPUC Code section 851.</p> <p>Project A9 – <u>Draft Final Subsequent EIR issued in May 2011 April 2012 by the South Coast Air Quality Management District.</u></p> <p>Project F3 – Draft EIR issued September 2011. <u>Project anticipated to be under continued CPUC review through 2012. <del>Construction</del> anticipated to start Spring 2012 and last up to 20 months (CPUC 2011).</u></p>	O1-72

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Comment #	Section	Page	Comment	Suggested Revision	
66	7.0 Mitigation Monitoring Plan	7-6, 7-7	<p>MM AQ-1: Please note, SCE would prefer to have several options for the purchase of emission reduction credits, including the purchase of mobile source emission reduction credits (MSERCs) and Reclaim Trading Credits (RTCs).</p> <p>Furthermore the tracking of daily emissions based on equipment and vehicle usage is not feasible to implement in the field during construction. SCE will estimate credits based on forecasted emissions estimated at the time that the construction schedule and operating conditions are finalized.</p>	<p>Please revise as follows: The applicant and/or SCE will have several options for obtaining emission offset mitigation, including the purchase of Reclaim Trading Credits (RTCs) or Mobile Source Emission Reduction Credits (MSERCs). The applicant and/or SCE will purchase and submit the required RTCs or MSERCs to the SCAQMD prior to the start of project construction. <del>The applicant will also track actual daily emissions during construction according to a monitoring plan that includes records of equipment and vehicle usage. The estimated credits will be based upon forecasted emissions submitted to the CPUC based on the anticipated construction schedule and operating conditions.</del></p> <p>Please revise other references to MM AQ-1 throughout document as appropriate.</p>	O1-73
67	7.0 Mitigation and Monitoring Plan	7-6	<p>APM AQ-7: Please note, SCE will abide by all applicable air quality regulations, including SCAQMD Rule 403 which regulates track-out control for fugitive dust on paved roads.</p>	<p>SCE requests that APM AQ-7 be removed and the DEIR be updated as appropriate.</p>	O1-74

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Comment #	Section	Page	Comment	Suggested Revision
68	7.0 Mitigation and Monitoring Plan	7-7	MM AQ-2: SCE suggests that additional language be added to MM AQ-2 to account for scenarios in which equipment meeting Tier 3 emission standards are not locally available.	<p>Please revise as follows:</p> <p>All off-road diesel-powered construction equipment greater than 50 horsepower used during reconductoring of the 66-kV subtransmission line will meet Tier 3 offroad emissions standards unless that such engine is not available for a particular item of equipment. In the event a Tier 3 engine is not available for any off-road engine larger than 50 hp, that engine shall have tailpipe retrofit controls that reduce exhaust emissions of NOx and PM to no more than Tier 3 emission levels.</p> <p>Tier 2 and Tier 1 engines will be allowed on a case-by-case basis only when the Applicant or SCE has documented that no Tier 3 equipment or emissions equivalent retrofit equipment is available for a particular equipment type that must be used to complete the Project's construction. This shall be documented with signed written correspondence by the appropriate construction contractor along with documented correspondence with at least two construction equipment rental firms. Equipment properly registered under and in compliance with CARB's Statewide Portable Equipment Registration Program is in compliance with this mitigation measure.</p> <p>Please revise other references to MM AQ-2 throughout document as appropriate.</p>

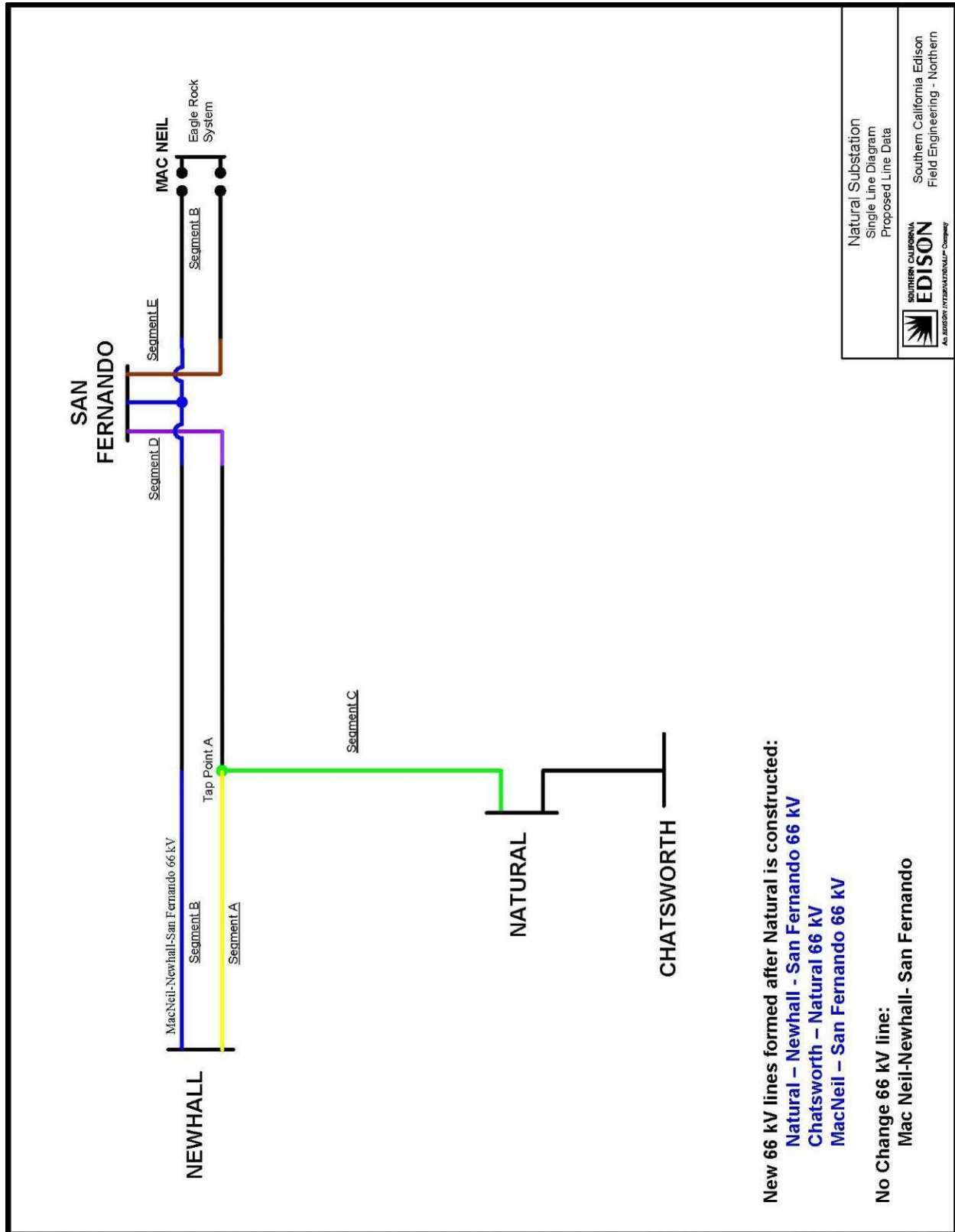
01-75

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Comment #	Section	Page	Comment	Suggested Revision	
69	7.0 Mitigation and Monitoring Plan	7-27, 7-28, 7-30	<b>MM CR-1, MM CR-2 and MM CR-6:</b> These Cultural Resources Mitigation Measures all refer to “construction permits.” Please note, the CPUC will not be issuing “construction permits” nor will any other agency. If the intention is for the applicant and SCE to comply with the Mitigation Measures, as applicable, prior to construction, then SCE recommends the measures be clarified to remove the word “permit”.	Please revise MM CR1, MM CR-2 and MM CR-6 as follows: “Prior to construction <del>permit issuance</del> ...” Please revise other references to these MM/s throughout document as appropriate.	O1-76
70	7.0 Mitigation and Monitoring Plan	7-44	<b>APM HZ-1:</b> Suggested revisions to clarify SCE’s FAA consultation.	Please revise text as follows: <b>APM HZ-1: Federal Aviation Administration Consultation. SCE will consult with the Federal Aviation Administration as part of the design phase for the SCE proposed project components to ensure that elevated structures such as TSPs will not pose a hazard for air traffic.</b>  SCE would file the necessary FAA Form 7460 for structures (poles/towers/conductors) that exceed notification requirements outlined in FAA Part 77. SCE would file the form upon completion of final engineering and prior to construction per FAA Part 77. All FAA recommendations, including the marking of conductor and installation of warning lights on TSPs will be implemented into the design of the project as appropriate.  Please revise other reference to APM HZ-1 throughout document as appropriate.	O1-77

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Comment #	Section	Page	Comment	Suggested Revision	
71	7.0 Mitigation and Monitoring Plan	7-50	MM HZ-2: Please note, the CPUC does not have the regulatory authority to require local Fire Department review of SCE's fire management information.	Please revise as follows: <b>MM HZ-2: Fire Department Review and Coordination.</b> Prior to construction of the proposed project components, the applicant and SCE will coordinate with CAL FIRE, the City of Los Angeles Fire Department, and the Los Angeles County and Ventura County Fire Departments (Fire Departments) according to the location of the proposed project components, to the satisfaction of the lead agency. . . . . The Fire Department will review the applicant and SCE's fire management information prior to construction of the proposed project components. Please revise other references to MM HZ-2 throughout document as appropriate.	O1-78
72	Chapter 7 Mitigation Monitoring Plan	7-54	<b>APM NS-3:</b> SCE recommends referring to "property owners" rather than "sensitive receptors"; consistent with the CPUC's standard noticing procedures. Please note that SCE would implement phased noticing to coincide with the construction schedule.	Please revise as follows: At least two weeks prior to construction, the applicant and SCE will notify all sensitive receptors property owners within 300 feet of construction activities of the potential to experience significant noise levels during construction." Please revise other references to APM NS-3 throughout document as appropriate.	O1-79





**SCE Draft Language for San Fernando to Sunshine Fiber Optic Telecommunications Route**

**“Telecommunications Route #4”**

May 22, 2012

Three telecommunications routes are discussed in the DEIR. However, in order for SCE to effectively interconnect the Natural Substation to the SCE system and provide the required subtransmission line protection, SCE has determined that the fiber optic ring associated with the Proposed Project needs to include an additional 5.5 mile fiber optic cable segment (to be called Telecommunications Route #4) from SCE’s San Fernando Substation to the entrance to the Sunshine Canyon Landfill in Sylmar. A description of the route and a map are attached.

O1-80

Telecommunications Route #4 is anticipated to use existing<sup>1</sup> overhead SCE and Los Angeles Water & Power (LADWP) wood distribution poles and LADWP subtransmission wood poles and require short spans of underground construction. One new pole is anticipated to be required at a location near Sepulveda Boulevard and San Fernando Road.

SCE anticipates that Telecommunications Route #4 construction requirements and impacts will be generally similar to those discussed in the DEIR for Telecommunications Segment #3, including Sections 2.2.9.1 (New Structures and Rights-of-Way), 2.2.10 (Access Roads), 2.3.1 (Construction Schedule, Personnel and Equipment), 2.3.3 (General Construction Methods and Materials), 2.3.10 (Reconductoring, Fiber Optic Cable Installation, and Structure Replacement), 2.3.1.3 (Staging Areas), 2.4.3 (Natural Substation, 66-kV Subtransmission Line, and Fiber Optic Cable Operations and Maintenance), and 2.5 (Plans and Applicant Proposed Measures).

O1-81

In addition, please note that the majority of the route for Telecommunications Route #4 has been evaluated by the CPUC in the DEIR due to the fact it follows a large portion of the same route as the DEIR’s proposed Routing Alternative A (Sylmar Substation to San Fernando Substation), which the Draft EIR recommends as the Environmentally Superior Alternative. Because Routing Alternative A overlaps a significant portion of Telecommunications Route #4, Routing Alternative A would conflict with SCE’s ability to maintain required diverse telecommunications paths.

O1-82

**Telecommunications Route #4 Description (please refer to enclosed map):**

O1-83

This route would extend approximately 5.5 miles from the San Fernando Substation to the entrance of the Sunshine Canyon Landfill as follows:

1. Within San Fernando Substation, the fiber optic cable would be installed within new underground conduit for approximately 170 feet to a pole inside of the substation, rise up and continue overhead to San Fernando Mission Boulevard.

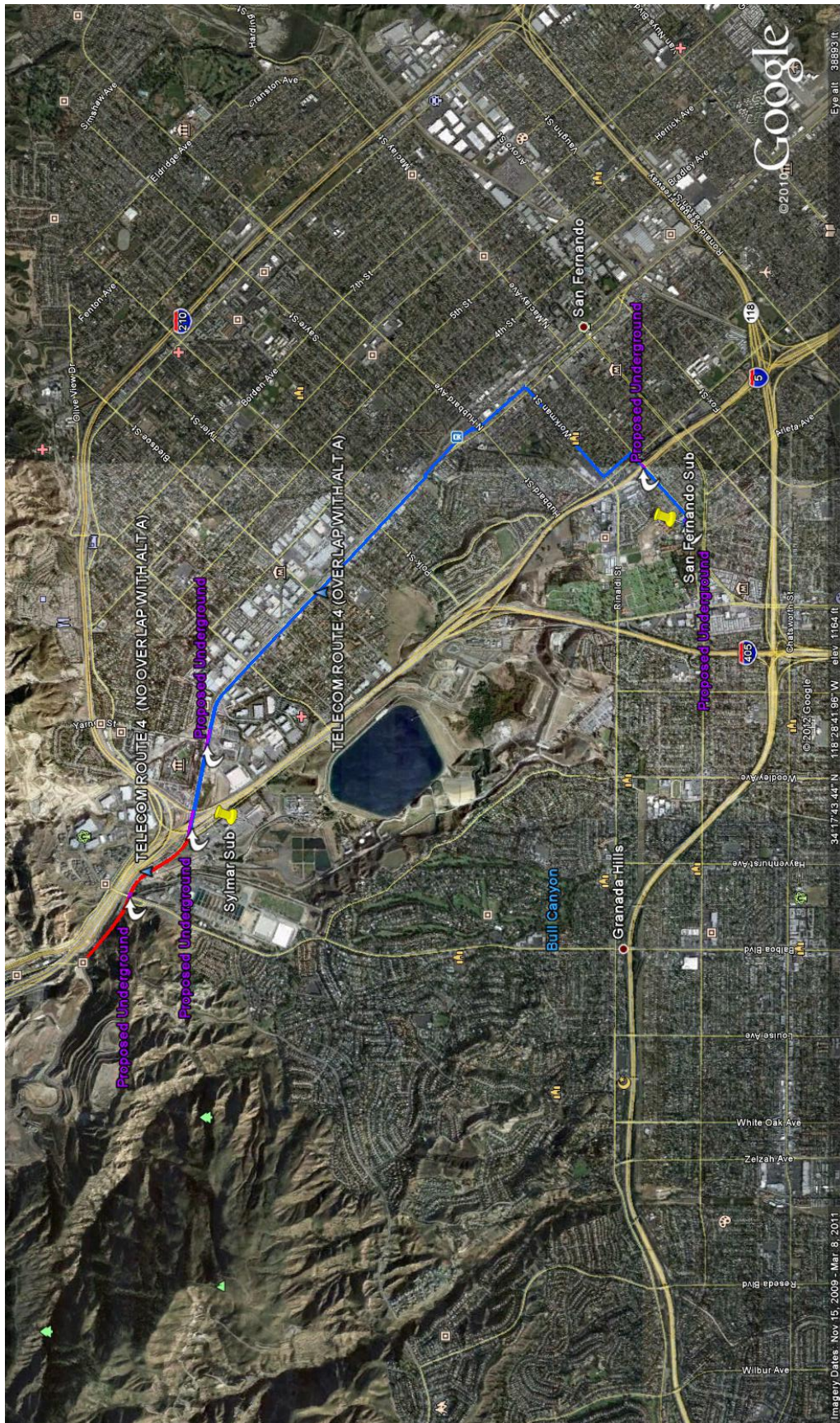
<sup>1</sup> As discussed in the Draft EIR regarding Telecommunications Routes #2 and #3, while SCE anticipates that existing overhead poles would be used for Telecommunications Route #4, SCE would not be able to determine if any poles require replacement in order to attach the new fiber optic cables until final engineering and windloading tests have been completed.

2. The cable would be installed on the north side of San Fernando Mission Boulevard heading northeast for approximately 2,000 feet to an SCE pole where it would transition down the pole and be installed in new underground conduit under the 5 Freeway for approximately 180 feet to an SCE pole on the northeast side of the 5 Freeway.
3. After transitioning to an overhead configuration on the northeast side of the 5 Freeway, the cable would be installed on existing overhead LADWP and SCE poles along the north side of San Fernando Mission Boulevard for approximately 450 feet to an alley east of and parallel to Laurel Canyon Boulevard. The route would proceed north along the west side of the alley where the fiber optic cable would be installed on existing overhead SCE wood poles for approximately 1,100 feet to Workman Street. The fiber optic cable would continue overhead on SCE wood poles east on the north side of Workman Street for approximately 3,700 feet to Truman Street.
4. At Truman Street, the route would turn north and continue northwest on the west side of Truman Street on both SCE and LADWP wood poles (note Truman Street merges into and becomes San Fernando Road) for approximately 14,500 feet to a LADWP pole where it would transition down the pole and be installed in new underground conduit proceeding northwest along San Fernando Road for approximately 750 feet to another LADWP pole. The route would transition to an overhead configuration for approximately 1,700 feet to an LADWP pole on the east side of the 5 Freeway. The cable would transition down the pole and be installed in new underground conduit along San Fernando Road under the 5 Freeway for approximately 700 feet to the southwest corner of the intersection of Sepulveda Boulevard and San Fernando Road. SCE would set a new wood riser pole to enable the fiber optic cable to transition to an overhead configuration and the route proceed northwesterly along the west side of San Fernando Road on LADWP poles for approximately 2,500 feet to the Balboa Boulevard/5 Freeway overpass.
5. At the south side of the Balboa Boulevard/5 Freeway overpass, the cable would transition down an existing LADWP pole and be installed in new underground conduit going north for approximately 260 feet to an existing LADWP pole on the north side of the Balboa Boulevard/5 Freeway overpass. The route would transition to an overhead configuration on existing LADWP subtransmission poles along the west side of San Fernando Road for approximately 2,300 feet to an LADWP pole at the entrance to the Sunshine Canyon Landfill at the northwest corner of Sunshine Canyon Road and San Fernando Road. The cable would transition to an underground configuration and connect to conduits constructed as part of the proposed Sunshine Gas Producers Renewable Energy Project within the Sunshine Canyon Landfill.<sup>2</sup>

O1-83  
Cont.

<sup>2</sup> The Sunshine Gas Producers Renewable Energy Project was recently approved by the South Coast Air Quality Management District (SCAQMD) in April 2012 (Supplemental Environmental Impact Report (SEIR) (State Clearinghouse No. 92041053))





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**O1 Southern California Edison, 5/22/2012**

- O1-1:** A revised Mitigation Monitoring, Compliance, and Reporting, and Program (MMCRP) which clearly assigns responsibility for compliance with APMs and mitigation measures is presented in Chapter 5 of this Final EIR.
- O1-2:** Refer to response to comment O1-5, and Master Response to Comments About Telecommunications Route #4 and Routing Alternative A.
- O1-3:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. In addition, refer to revisions made to EIR Chapter 2.0, "Project Description," as presented in Appendix A of this Final EIR.
- O1-4:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project.
- O1-5:** Refer to Master Response to Comments About Telecommunications Route #4 and Routing Alternative A, and revisions made to EIR Chapter 2, "Project Description," Chapter 3, "Alternatives," and Chapter 5, "Comparison of Alternatives," and other revised sections of the EIR, as presented in Appendix A of this Final EIR. Revisions to Routing Alternative A are described in Chapter 3, but this alternative is no longer carried forward for evaluation in Chapter 5 as revised in this Final EIR because of the substantial amount of overlap between Routing Alternative A and Telecommunications Route #4 (EIR Figures 2-8 and 3-1). As noted in the comment, this overlap indicates that Telecommunications Route #4 and Routing Alternative A would not be installed in geographic locations distant enough from one another to ensure that, if one fiber optic line were removed from service due to an incident along one of the routes, a second (redundant) fiber optic line would remain in service. Therefore, because Telecommunications Route #4 was added to the project description, Routing Alternative A was removed from Chapter 5, "Comparison of Alternatives."
- O1-6:** Refer to Master Response to Comments About Telecommunications Route #4 and Routing Alternative A. Information about Telecommunications Route #4, including an analysis of potential impacts from this project component, has been added to the revised EIR sections, as presented in Appendix A of this Final EIR. These revisions have been made because, although the two routes are substantially similar, Telecommunications Route #4 would include an approximately 0.5-miles-long segment that Routing Alternative A does not. In addition, the assessment of impacts related to project alternatives in the EIR is more qualitative than the assessment of impacts from the proposed project components, per CEQA Guidelines Section 15126.6(d) ("Evaluation of Alternatives. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.") For these reasons, the CPUC was required to fully evaluate the potential impacts of the new project component, Telecommunications Route #4, in this Final EIR.
- O1-7:** The information in the attachments has been added to the revised EIR sections. Refer to these revisions as presented in Appendix A of this Final EIR. Refer also to Master Response to Comments About Telecommunications Route #4 and Routing Alternative A.



- O1-8:** The acronyms table has been revised to include this information.
- O1-9:** Refer to revisions made to “Executive Summary,” as presented in Appendix A of this Final EIR.
- O1-10:** Refer to revisions made to “Executive Summary,” as presented in Appendix A of this Final EIR.
- O1-11:** The suggested revision was not made, although this section has been revised to clarify the CPUC’s authority to preempt local ordinances and rules. The commenter refers to CPUC General Order 131-D, which clarifies that “local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission’s jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters. In instances where the public utilities and local agencies are unable to resolve their differences, the Commission shall set a hearing no later than 30 days after the utility or local agency has notified the Commission of the inability to reach agreement on land use matters.” Article XII, Section 8 of the California Constitution further elaborates: “A city, county, or other public body may not regulate matters over which the Legislature grants regulatory power to the Commission. This section does not affect power over public utilities relating to the making and enforcement of police, sanitary, and other regulations concerning municipal affairs pursuant to a city charter existing on October 10, 1911, unless that power has been revoked by the city’s electors, or the right of any city to grant franchises for public utilities or other businesses on terms, conditions, and in the manner prescribed by law.”
- The CPUC has exercised its authority to preempt local ordinances and rules in proceedings for other projects on a case-by-case basis; for example, when evidence shows that “local interests” could interfere with or undermine the regulation of matters of statewide importance (e.g., if local discretionary planning processes could result in the delay, or denial, of the approval of a project that furthers an established interest of the state), resulting in obstacles or uncertainties to the furtherance of these matters. The Aliso Canyon project EIR includes a discussion of local discretionary planning processes and regulations and evaluates potential project impacts per these local standards as appropriate, in order to fulfill the “land use consultation” requirement of CPUC General Order 131-D, and provide public disclosure of this process. Whether the CPUC chooses to preempt local authority in the proceeding for the Aliso Canyon project will be a matter determined by the ALJ in the review of the project application, and/or by the Commission during its review of the project.
- O1-12:** Refer to response to comment O1-5.
- O1-13:** Refer to revisions to EIR Chapter 2, “Project Description,” as presented in Appendix A of this Final EIR.
- O1-14:** Refer to revisions to EIR Chapter 2, “Project Description,” as presented in Appendix A of this Final EIR.

- O1-15:** Refer to revisions to EIR Chapter 2, “Project Description,” as presented in Appendix A of this Final EIR.
- O1-16:** Refer to revisions to EIR Chapter 2, “Project Description,” as presented in Appendix A of this Final EIR.
- O1-17:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. The Draft EIR analysis was based on the maximum number of tubular steel poles (TSPs) that may be installed during project construction.
- O1-18:** Refer to revisions to EIR Chapter 2, “Project Description,” as presented in Appendix A of this Final EIR.
- O1-19:** Refer to revisions to EIR Chapter 2, “Project Description,” as presented in Appendix A of this Final EIR.
- O1-20:** Refer to revisions made to EIR Chapter 2, “Project Description,” as presented in Appendix A of this Final EIR.
- O1-21:** Refer to revisions to EIR Chapter 2, “Project Description,” as presented in Appendix A of this Final EIR.
- O1-22:** Refer to revisions to EIR Chapter 2, “Project Description,” as presented in Appendix A of this Final EIR.
- O1-23:** Refer to revisions to EIR Chapter 2, “Project Description,” as presented in Appendix A of this Final EIR.
- O1-24:** Refer to revisions to EIR Chapter 2, “Project Description,” as presented in Appendix A of this Final EIR.
- O1-25:** Refer to revisions to EIR Chapter 2, “Project Description,” as presented in Appendix A of this Final EIR.
- O1-26:** Refer to revisions to EIR Chapter 2, “Project Description,” as presented in Appendix A of this Final EIR.
- O1-27:** Refer to revisions to EIR Chapter 2, “Project Description,” as presented in Appendix A of this Final EIR.
- O1-28:** Refer to revisions to EIR Chapter 2, “Project Description,” as presented in Appendix A of this Final EIR.
- O1-29:** Refer to revisions to EIR Chapter 2, “Project Description,” as presented in Appendix A of this Final EIR.

- O1-30:** Refer to revisions to EIR Chapter 2, "Project Description," as presented in Appendix A of this Final EIR.
- O1-31:** Refer to revisions to EIR Chapter 2, "Project Description," as presented in Appendix A of this Final EIR.
- O1-32:** Refer to revisions to EIR Chapter 2, "Project Description," as presented in Appendix A of this Final EIR.
- O1-33:** Refer to revisions made to EIR Chapter 2, "Project Description," as presented in Appendix A of this Final EIR.
- O1-34:** Refer to revisions to EIR Chapter 2, "Project Description," as presented in Appendix A of this Final EIR.
- O1-35:** Refer to revisions to EIR Chapter 2, "Project Description," as presented in Appendix A of this Final EIR.
- O1-36:** Refer to revisions to EIR Chapter 2, "Project Description," as presented in Appendix A of this Final EIR.
- O1-37:** Refer to the revisions to EIR Chapter 2, "Project Description," as presented in Appendix A of this Final EIR.
- O1-38:** Refer to revisions to EIR Chapter 2, "Project Description," as presented in Appendix A of this Final EIR.
- O1-39:** Refer to revisions to EIR Chapter 2, "Project Description," as presented in Appendix A of this Final EIR.
- O1-40:** Refer to revisions to EIR Chapter 2, "Project Description," as presented in Appendix A of this Final EIR.
- O1-41:** Refer to revisions to EIR Chapter 2, "Project Description," as presented in Appendix A of this Final EIR.
- O1-42:** Refer to response to comment O1-5.
- O1-43:** Refer to response to comment O1-11.
- O1-44:** Refer to revisions to EIR Section 4.1, "Aesthetics," as presented in Appendix A of this Final EIR.
- O1-45:** Refer to revisions to EIR Section 4.1, "Aesthetics," as presented in Appendix A of this Final EIR.
- O1-46:** Refer to revisions to EIR Section 4.3, "Air Quality," as presented in Appendix A of this Final EIR.



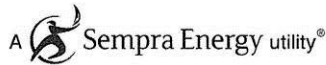
- O1-47:** Refer to response to comment O1-11.
- O1-48:** Refer to revisions to EIR Section 4.3, “Air Quality,” as presented in Appendix A of this Final EIR.
- O1-49:** Refer to response to comment O1-11.
- O1-50:** Refer to response to comment O1-11.
- O1-51:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR. The discussion of EMFs has been moved to Chapter 2.0, “Project Description.”
- O1-52:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR.
- O1-53:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR.
- O1-54:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR.
- O1-55:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR.
- O1-56:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR.
- O1-57:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR.
- O1-58:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR.
- O1-59:** Refer to revisions made to EIR Section 4.9, “Hydrology and Water Quality,” as presented in Appendix A of this Final EIR.
- O1-60:** Refer to revisions made to EIR Section 4.9, “Hydrology and Water Quality,” as presented in Appendix A of this Final EIR.
- O1-61:** Refer to the revisions to EIR Section 4.9, “Hydrology and Water Quality,” as presented in Appendix A of this Final EIR.
- O1-62:** Refer to the revisions to EIR Section 4.10, “Land Use and Planning,” as presented in Appendix A of this Final EIR.
- O1-63:** Refer to response to comment O1-11.

- O1-64:** Refer to response to comment O1-11.
- O1-65:** Refer to revisions made to EIR Section 4.11, “Noise,” as presented in Appendix A of this Final EIR.
- O1-66:** No revision is required. The impact discussion in EIR Section 4.11, “Noise,” of the EIR presents a range of potential noise levels that could be generated by the transformers during operation of the Natural Substation, and a conservative level of analysis. As indicated in this section and under this analysis, estimated noise levels from operational activities at the Natural Substation would not exceed local noise standards for permanent or stationary sources.
- O1-67:** Refer to response to comment O1-11.
- O1-68:** Refer to response to comment O1-11.
- O1-69:** Refer to response to comment O1-11.
- O1-70:** Refer to response to comment O1-5.
- O1-71:** Refer to revisions made to EIR Section 6.1, “Cumulative Impacts,” as presented in Appendix A of this Final EIR.
- O1-72:** Refer to revisions made to EIR Section 6.1, “Cumulative Impacts,” as presented in Appendix A of this Final EIR.
- O1-73:** Refer to revisions made to EIR Section 4.3, “Air Quality,” as presented in Appendix A of this Final EIR. Revisions were made to Mitigation Measure AQ-3 (formerly Mitigation Measure AQ-1) to include both Mobile Source Emission Reduction Credits (MSERCs) and Regional Clean Air Incentive Market Trading Credits (RTCs).
- O1-74:** Refer to revisions made to EIR Chapter 2, “Project Description,” and Section 4.3, “Air Quality,” as presented in Appendix A of this Final EIR.
- O1-75:** Refer to revisions made to EIR Section 4.3, “Air Quality,” as presented in Appendix A of this Final EIR.
- O1-76:** Refer to revisions made to EIR Section 4.5, “Cultural Resources,” as presented in Appendix A of this Final EIR. Revisions were made to Mitigation Measure CR-1, Mitigation Measure CR-2 and Mitigation Measure CR-6.
- O1-77:** Refer to revisions made to EIR Chapter 2, “Project Description,” as presented in Appendix A of this Final EIR.
- O1-78:** Refer to Master Response to Comments About Fire Safety and Master Response to Comments About Underground Alternatives.

- O1-79:** Refer to revisions made to EIR Section 6.1, “Cumulative Impacts,” as presented in Appendix A of this Final EIR.
- O1-80:** Refer to response to comment O1-2
- O1-81:** Refer to response to comment O1-3.
- O1-82:** Refer to responses to comments O1-4 and O1-5.
- O1-83:** Refer to revisions made to EIR Chapter 2, “Project Description,” as presented in Appendix A of this Final EIR. In addition, this information has been incorporated throughout the EIR as appropriate and as presented in Appendix A of this Final EIR.

02 Southern California Gas Company, 5/22/2012

Letter O2



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RECEIVED MAY 23 2012

May 22, 2012

Aliso Canyon Turbine Replacement Project  
505 Sansome Street, Suite 300  
San Francisco, CA 94111

**Re: Aliso Canyon Turbine Replacement Project  
Draft Environmental Impact Report (California SCH 2010101075)**

Dear Sir/Madam:

Southern California Gas Company ("SoCalGas") appreciates the opportunity to review and comment on the Draft Environmental Impact Report ("DEIR") for the Aliso Canyon Turbine Replacement Project ("Project"). SoCalGas supports the finding by the preparers of the DEIR that SoCalGas' replacement of its obsolete gas powered turbines with, new more efficient electric driven compressors is the Environmentally Superior Project (as defined in the DEIR). This letter, together with the tables and exhibits attached hereto contain the comments of SoCalGas to the DEIR.

O2-1

While the tables and exhibits provide most of SoCalGas' comments, this letter emphasizes and elaborates on several comments SoCalGas has regarding the DEIR.

**1. The Environmentally Superior Alternative Has a Greater Degree of "Environmental Superiority" Than is Otherwise Described in the DEIR's Comparison of Alternatives Section**

O2-2

Section 5 of the DEIR, Comparison of Alternatives, correctly identifies SoCalGas' proposed project, which replaces the obsolete gas turbine driven compressor system with electric driven compressors, as the "Environmentally Superior Alternative" (see, DEIR p. 5-13). In addition, the DEIR correctly points out that resource areas affected by long-term impacts should generally be given more weight in comparison to resource areas that may be impacted by short-term or temporary impacts when deciding on the environmentally superior alternative.

However, SoCalGas' review of the DEIR's analysis of alternatives contained in Section 5.2 has found that in many of the resource areas, the DEIR analysis incorrectly concluded in favor of the Design Alternative. For example, the DEIR presumes that in the event outside contractors were used for construction, those workers would need to relocate to the vicinity of

O2-3

O2-4

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Page 2

the proposed project (DEIR p. 4.14-5). If those limited number of workers moved to the vicinity, the workers would necessarily cause impacts to recreation. Nonetheless, even assuming that all the Project's construction workers had to move to the vicinity of the proposed project, the large number of parks and recreational resources within the vicinity of the Project can absorb such workers without impact. In fact, the DEIR finds almost 40 parks and other recreational areas within the vicinity of the project. These parks and recreational areas, when combined provide thousands of acres of recreational areas and currently serve hundreds of thousands of residents in Los Angeles and Ventura counties. The addition of a few dozen additional workers, who may occasionally and individually use such resources at various times and days, is literally, insignificant.

O2-4  
Cont.

Indeed, a CEQA criterion for impacts on recreation is not simply: "would the project increase the use of existing neighborhood or regional parks for other recreational facilities" (see, CEQA Guidelines, Appendix G). Instead, the criterion includes the modifier "...such that substantial physical deterioration of the facility would occur or be accelerated." It is unfathomable that the addition of the amount of workers needed for this project could ever reach a level of impact needed to get to a level of "less than significant" (*id.*) As such, the DEIR should conclude that there is "no impact" to recreation resources. Yet, finding that proposed project has "less than significant" impact to recreation resources causes the Design Alternative to become inappropriately categorized as "Environmentally Superior" for this resource area (DEIR p. 5-3, 5-8), because the DEIR presumes all workers in this scenario will be local when constructing the Design Alternative.

O2-5

O2-6

A "less than significant" finding is particularly problematic because all evidence dictates that the proposed project should be considered "equal to" the Design Alternative with regards to impacts to recreation. The proposed project and the Design Alternative should be equal because under either scenario the limited number of workers needed for either the proposed project or the Design Alternative would have no discernible impact to the thousands of acres of recreation space in the vicinity of the Project. To extent the workers moved temporarily, it would be to pre-existing housing, presumably vacated by persons who have moved away from the area. The end result would be no net increase in population to the vicinity, and no resulting net potential increase in park use. As a result, both the proposed project and the Design Alternative should be categorized as "no impact."

O2-7

The above example is but one of several instances where a more robust consideration of alternatives analysis results in finding that the proposed project is "equal to" or "environmentally superior" to the Design Alternative in many other resource areas beyond long term air quality impacts. In fact, our review and analysis of the materials contained in the DEIR shows that the proposed project would be environmentally superior or similar in comparison to the Design Alternative with regard to several resource areas, resulting in substantially reduced or similar impacts for the following resource areas:

O2-8

- Agriculture and Forestry Resources
- Air Quality (operations)

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Page 3

- Geology, Soils, and Mineral Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Population and Housing
- Recreation

O2-8  
Cont.

The attached exhibit, together with the attached Table 5.1, describe and comment on this topic in greater detail. Accordingly, we ask that you review our findings and revise the DEIR to appropriately address the analysis in the Comparison of Alternatives section.

## **2. Proposal for Replacement Air Quality Mitigation Measure**

The DEIR finds that construction activities associated with the Project could generate NOx emissions that exceed applicable thresholds. As a result, SoCalGas is required to mitigate emissions to a less than significant level. To do so, SoCalGas had originally proposed that it could mitigate NOx through the purchase of Regional Clean Air Incentive Market Trading Credits (RTC's) for every pound of NOx emissions in excess of the South Coast Air Quality Management District (SCAQMD) daily significance threshold of 100 pounds per day. This mitigation measure has been incorporated into the DEIR as MM AQ-1 (see, DEIR p. 4.3-13). In lieu of the mitigation measure found in AQ-1, SoCalGas respectfully requests that AQ-1 be modified to instead require that SoCalGas purchase Mobile Source Emission Reduction Credits (MSERCs) to mitigate NOx emissions during construction activities to a level of less than significant.

O2-9

SoCalGas believes that the purchase of MSERCs instead of RTCs is a more appropriate option for one key reason: Almost all of the emissions generated during the construction will be coming from mobile sources such as trucks, cranes and other on-road and off-road vehicles. Furthermore, SCAQMD and California Air Resources Board (CARB) encourage the acquisition of MSERCs as an appropriate way to mitigate mobile source emissions.<sup>1</sup> These credits are created by purchasing and deploying lower-emitting vehicles, thereby reducing mobile source emissions. Therefore, SoCalGas recommends that MSERCs, instead of RTC's, be acquired to mitigate these mobile source emissions. In all cases where mitigation measures were required, SoCalGas has always used mitigation measures which are localized and contemporaneous. For these reasons, SoCalGas requests a modification of MM-AQ1 in accordance with its recommendations above and those contained in comment 11 of the attached table.

O2-10

## **3. Some Applicant Proposed Measures (APM's) Have Been Modified in a Manner Not Proposed by the Applicant.**

<sup>1</sup> See, e.g., SCAQMD Regulation XVI, SCAQMD Rule 2202.



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Page 4

The Proponent's Environmental Assessment ("PEA") that was submitted as part of the application to amend the Certificate of Public Convenience and Necessity ("CPCN") for the Project proposed "various design features or APM's... to be incorporated into the project design to avoid and minimize impacts to various environmental resource areas" (see PEA p. 5-3).<sup>2</sup> After SoCalGas submitted the CPCN, several of these APM's were later modified and revised by SoCalGas as a result of various data requests propounded on SoCalGas by the preparers of the DEIR. However many of APM's in the DEIR were not revised in accordance with the data request revisions provided by SoCalGas (the "Applicant").<sup>3</sup> Instead, the APM's have been revised in the DEIR independent of SoCalGas' comments. As such, they are no longer "Applicant Proposed Measures." In those instances where the Commission has chosen to re-write SoCalGas' APM's in a manner not in accordance with SoCalGas' APM's (as identified in the attached table), SoCalGas respectfully asks that those APM's instead be revised to become mitigation measures under the Mitigation and Monitoring Program.

O2-11

**4. DEIR Indicates that the SoCalGas Should Potentially Secure Discretionary Approvals in Contravention of the Commission's Preemptive Jurisdiction.**

As noted in the DEIR, the Commission is vested with jurisdiction over the project (see, DEIR p. 1-4). To this end, local agencies are pre-empted from exercising discretionary permitting authority over the Proposed Project. Because of this, SoCalGas should not be required to secure separate discretionary permits from local city or county agencies prior to construction. Such permits contravene the authority that has been placed in the Commission's hands pursuant to Article XII of the California Constitution. Further, such permits could have the effect of potentially modifying or precluding construction of the Project after it has been approved by the CPUC. Yet, the DEIR, in Applicant Proposed Measure BR-8 (which is another APM that was revised in the DEIR in a manner inconsistent with SoCalGas' comments), requires SoCalGas to submit an Oak Tree Application to Los Angeles County, and thereafter obtain an Oak Tree Permit prior to construction (see, DEIR p. ES-21). Los Angeles County's Oak Tree Permit, while containing some non-discretionary procedures to securing a permit, also contains discretionary permitting elements to it. As a consequence, the APM, as written could inadvertently require SoCalGas to proceed with a discretionary permitting that contravenes the Commission's authority.

O2-12

As an alternative to requiring that SoCalGas "submit an Oak Tree Permit Application (including an Oak Tree Report) to Los Angeles County and obtain an Oak Tree Permit prior to construction," the specific requirements that would otherwise be included in the discretionary permit should instead be incorporated into the Final EIR as a mitigation measure. And at the very minimum, the APM should be revised to address that SoCalGas would be responsible for securing non-discretionary permits related to oak tree removal or modifications. It should be

O2-13

<sup>2</sup> Commission Application (A.) 09-09-020

<sup>3</sup> See SoCalGas December 1, 2011 response to Commission regarding Applicant Proposed Measures.

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Page 5

noted that APM BR-8 already requires that the SoCalGas follow any specific measures and/or agency guidance. It should also be noted that SoCalGas is not in any way opposed to undertaking such measures. SoCalGas are only commenting on this APM to the extent it requires SoCalGas to secure discretionary permits from the County of Los Angeles, or any other local agency.

O2-13  
Cont.

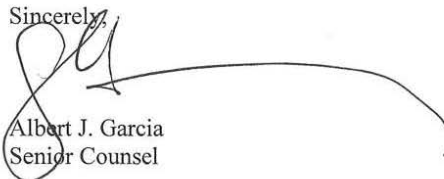
**5. Clarification Regarding Commission Approved Items in DEIR**

SoCalGas notes that in numerous sections of the DEIR, and in particular the mitigation measures, the term "Commission-approved" or "CPUC-approved" is used when referring to consultants that must be approved by the Commission to monitor the project, and subsequent reports required by various mitigation measures. SoCalGas respectfully asks that the Final EIR make clear that the use of the terms "Commission-approved" or "CPUC-approved" in the contexts described above do not intend to indicate that CPUC authority must be granted by the approval of a Commissioner or by the full Commission, but rather by CPUC staff entrusted with monitoring compliance with the requirements imposed in the DEIR. As reflected on page ES-3 of the DEIR, "if the CPUC approves the project, the CPUC staff would closely monitor the applicant's compliance with requirements imposed by the mitigation measures." (See DEIR p. ES-3, and p. 7-1).

O2-14

If you have any questions regarding these comments, please feel free to contact me.

Sincerely,



Albert J. Garcia  
Senior Counsel

AJG:dnz  
Enclosures (See list on following page)



List of Enclosures:

1. Appendix A – Master Comment Table

- i. Exhibit A-1: Revised Tables ES-1 and 7-1
- ii. Exhibit A-2: Habitat Evaluation for Breeding Least Bell's Vireo and Southwestern Willow Flycatcher
- iii. Exhibit A-3: Revised Figures 2-3 and 2-4
- iv. Exhibit A-4: Revised Table 2-7 Land Disturbance
- v. Exhibit A-5: Revised Noise Assessment for Fiber Optic Installation/Telecom Construction Activities
- vi. Exhibit A-6: Revised Table 5.1 Comparison of Alternatives to the Proposed Project (Adverse Environmental Impacts by Resource Area)

## APPENDIX A

APPENDIX A  
SoCalGas's Aliso Canyon Turbine Replacement (ACTR) Project  
Comments to the Draft EIR

Master Comment Table						
Comment No.	Section	Page	Lines	Original Text	Suggested Revision	Comment
1	Executive Summary	ES-1	5-6	"Southern California Gas Company (the applicant) provides natural gas services to approximately six million customers in Southern California, and operates four storage fields to meet customer demand."	Revise as follows: "Southern California Gas Company (the applicant) provides natural gas services to approximately six million customers in Southern California,..."	Under the heading <b>Introduction and Project Overview</b> , the number of customers receiving service from Southern California Gas Company is inaccurate and should be updated to reflect service area. O2-15
2	Executive Summary	ES-1	37	"The proposed compressors would be capable of increasing the storage field's natural-gas injection capacity"	Revise as follows: "The proposed <del>compressors</del> project would be capable of increasing the storage field's natural-gas injection capacity"	Under the heading <b>Settlement Agreement</b> , the 2 <sup>nd</sup> paragraph should be revised for accuracy. O2-16
3	Executive Summary	ES-1	42	"The proposed compressors would also improve natural gas service reliability and efficiency"	Revise as follows: "The proposed project <del>compressors</del> would also improve natural gas service reliability and efficiency"	Under the heading <b>Settlement Agreement</b> , the 3 <sup>rd</sup> paragraph should be revised for accuracy. The combined project would improve reliability and efficiency not just the compressors. This is a GLOBAL COMMENT O2-17
4	Executive Summary	ES-1	43-45	"Gas turbines alter compressor speed by varying fuel input. The new variable-speed motors that would be installed as part of the proposed project have the ability to alter compressor speed as gas pressure ratios and flow rates change more precisely than the existing gas turbines. Hence, the new motors would be capable of..."	Revise as follows: "Gas turbines alter compressor speed by varying fuel input. The new <del>motor-driven</del> variable-speed <del>motors</del> compressors that would be installed as part of the proposed project have the ability to alter compressor speed as gas pressure ratios and flow rates change more precisely than the existing gas turbines. Hence, the new motors would be capable of..."	Under the heading <b>Settlement Agreement</b> , the 3 <sup>rd</sup> paragraph should be revised for accuracy. The combined project would improve reliability and efficiency not just the compressors. This is a GLOBAL COMMENT O2-18
5	Executive Summary	Figure E-1	n/a		Revise Figure E-1 per comments provided.	On Figure E-1 <b>Vicinity Map and Overview of the Proposed Project</b> , the legend indicates that Natural Substation (Proposed) is shown as a yellow triangle on the map. However, the San Fernando Substation is also presented as a yellow triangle. The legend should be updated to accurately present different SCE substations. O2-19

APPENDIX A  
SoCalGas's Aliso Canyon Turbine Replacement (ACTR) Project  
Comments to the Draft EIR

Master Comment Table						
Comment No.	Section	Page	Lines	Original Text	Suggested Revision	Comment
6	Executive Summary	ES-3	18	"The construction of the proposed project would expand the storage field's natural-gas injection capacity from approximately 300 million cubic feet (cf) per day to approximately 450 million cf per day."	Revise as follows: "The construction of the proposed project would expand the storage field's natural-gas injection capacity from approximately 300 million standard cubic feet (scf) per day to approximately 450 million scf per day."	Under the heading <b>Description of the Proposed Project</b> , the units used to describe the natural-gas injection capacity, cubic feet, are inaccurate and should be revised to standard cubic feet. This is a <b>GLOBAL COMMENT</b>
7	Executive Summary	ES-3	36 – Footnote 2	"The initial build of the Natural Substation would include the installation of two 28 MVA, 66/12-kV transformers. Space would be available for the installation of up to two additional 28 MVA transformers for a total of 112 MVA if needed in the future. SCE estimates that 50 megawatts of electricity would be required to meet the increase in electrical demand from operation of the proposed electric-driven compressors."	Revise as follows: "The initial build of the Natural Substation would include the installation of two 28 MVA, 66/12-kV transformers. Space would be available for the installation of up to two additional 28 MVA transformers as spares in the event of long term transformer delivery delays for a total of 112 MVA if needed in the future. SCE estimates that 50 megawatts of electricity would be required to meet the increase in electrical demand from operation of the proposed electric-driven compressors."	Footnote 2 - Modify per latest information provided to CPUC.
8	Executive Summary	ES-4	3-4	<ul style="list-style-type: none"> <li>"Install equipment at SCE's Newhall, Chatsworth, and San Fernando Substations in the proposed project area...."</li> </ul>	Revise as follows: "Description of the Proposed Project" <ul style="list-style-type: none"> <li>Install equipment at SCE's Newhall Substation, in the City of Santa Clarita, Chatsworth Substation, in the County of Ventura, and San Fernando Substations in the City of Los Angeles proposed project area; and,"</li> </ul>	Under the heading <b>Description of the Proposed Project</b> , the term "project area" as used in this context, is undefined and ambiguous. This is <b>GLOBAL COMMENT</b> throughout the document. Ensure that the terms "proposed project area" or "project site" are being used consistently and appropriately.
9	Executive Summary	ES-4	23-38	"Areas of Potential Controversy"	Revise as follows: "Areas of Potential Controversy Concern"	Under the heading <b>Areas of Potential Controversy</b> should be revised to <b>Areas of Potential Concern</b> . The scoping comments do not warrant calling out most of the resources areas as

APPENDIX A  
SoCalGas's Aliso Canyon Turbine Replacement (ACTR) Project  
Comments to the Draft EIR

Master Comment Table					
Comment No.	Section	Page	Lines	Original Text	Suggested Revision
					areas of "controversy"; a term that implies disputes, arguments or debates.
10	Executive Summary	ES-4	44-45	<p>"The evaluation of potential project impacts resulted in the determination that the following environmental impacts would be less than significant with or without mitigation:"</p>	<p>Revise as follows:</p> <p>"The evaluation of potential project impacts resulted in the determination that there would be no impacts for the following <u>environmental impacts</u> resource areas:</p> <ul style="list-style-type: none"> <li>• <u>Agriculture and Forestry Resources</u></li> <li>• <u>Land Use and Planning</u></li> <li>• <u>Population and Housing</u></li> <li>• <u>Recreation</u></li> </ul> <p>The evaluation of potential project impacts resulted in the determination that impacts would be less than significant without mitigation for the following resource areas:"</p> <ul style="list-style-type: none"> <li>• <u>Aesthetics</u></li> <li>• <u>Geology, Soils, and Mineral Resources</u></li> <li>• <u>Greenhouse Gas Emissions</u></li> <li>• <u>Hydrology and Water Quality</u></li> <li>• <u>Public Services and Utilities</u></li> <li>• <u>Transportation and Traffic</u></li> </ul> <p>The evaluation of potential project impacts resulted in the determination that impacts would be less than significant with mitigation for the following resource areas:</p> <ul style="list-style-type: none"> <li>• <u>Air Quality</u></li> <li>• <u>Biological Resources</u></li> <li>• <u>Cultural Resources</u></li> <li>• <u>Hazards and Hazardous Materials</u></li> <li>• <u>Noise</u></li> </ul>

O2-24  
Under the heading **Less than Significant Impacts (Including Significant Impacts that Can Be Mitigated)**, the text should be revised to distinguish between the following impact determinations for construction and operation: no impact, less than significant, and less than significant with mitigation.

APPENDIX A  
SoCalGas's Aliso Canyon Turbine Replacement (ACTR) Project  
Comments to the Draft EIR

Master Comment Table					
Comment No.	Section	Page	Lines	Original Text	Suggested Revision
11	Executive Summary	ES-9	Table ES-1, MM AQ-1	<p><b>"MM AQ-1: Oxides of Nitrogen (NOx) Credits.</b> The emissions of NOx due to construction of the proposed project will be mitigated through the purchase of Regional Clean Air Incentive Market Trading Credits (RTCs) for every pound of NOx emissions in excess of the SCAQMD daily significance threshold of 100 pounds per day. The total amount of NOx RTCs to be purchased will be calculated when the construction schedule and operating conditions are finalized. The applicant will purchase and submit the required RTCs to the SCAQMD prior to the start of project construction. The applicant will also track actual daily emissions during construction according to a monitoring plan that includes records of equipment and vehicle usage."</p>	<p>Revise as follows:  <b>"MM AQ-1: Oxides of Nitrogen (NOx) Credits.</b>  The emissions of NOx due to construction of the proposed project will be mitigated through the purchase of <del>Regional Clean Air Incentive Market Trading Credits</del> <b>Regional Clean Air Incentive Market Trading Credits</b> for every pound of NOx emissions in excess of the SCAQMD daily significance threshold of 100 pounds per day. The total amount of NOx RTCs to be purchased will be calculated when the construction schedule and operating conditions are finalized. The applicant will purchase and submit the required RTCs to the SCAQMD prior to the start of project construction. The applicant will also track actual daily emissions during construction according to a monitoring plan that includes records of equipment and vehicle usage."</p>
12	Executive Summary	ES-21	n/a	<p>"...surveys for least Bell's vireo and southwestern willow flycatcher in areas of suitable or potentially suitable habitat..."</p>	<p>Revise as follows:  <b>Under the heading MM BR-8 Pre-Construction Surveys for Least Bell's Vireo and Southwestern Willow Flycatcher</b>, suitable breeding habitat is well defined in the survey protocol literature and it is inappropriate to include "potentially suitable" for the purpose of identifying presence/absence protocol survey locations. See revised Table ES-1 as provided in Exhibit A-1, and supporting analysis as provided in Exhibit A-2 of the accompanying cover letter.</p>
13	Executive Summary	ES-25	n/a	<p>"Details of the restoration plan will be pending between SCE, USFWS and CDFG."</p>	<p>Revise as follows:  <b>Under the heading MM BR-10 Restoration of Plummer's Mariposa Lily and Slender Mariposa Lily</b>, it is not appropriate to include USFWS in consultation since they do not have any jurisdiction</p>

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						over non-listed plants. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter. O2-27 Cont.
14	Executive Summary	ES-26	n/a	"5. All temporary disturbance areas.....would be monitored on a quarterly basis for one year...."	Revise as follows: "5. All temporary disturbance areas not subject to existing infestations of invasive plants.....would be monitored on a quarterly basis for one year...."	Under the heading <b>MM BR-11 Non-Native and Invasive Plant Species</b> , number 5, there is no resource benefit to monitoring temporary disturbance areas already subject to widespread infestations of non-native grasses and invasive plants. Please see revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter. O2-28
15	Executive Summary	ES-27	n/a	"1. A qualified ecologist will survey and determine the spatial extent of riparian zones....and Telecommunications Route #2."	Revise as follows: "1. A qualified ecologist will survey and determine the spatial extent of riparian zones....and Telecommunications Route #2 that could be adversely affected by project activities."	Under the heading <b>MM BR-12: Minimize Impact on Riparian Habitat</b> , there is no need to survey the riparian areas within the 3,600 acre storage field that will not be affected by project activities. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter. O2-29
16	Executive Summary	ES-46	n/a	"MM HZ-1: Soil Sampling and Contaminated Soils Contingency Plan. The applicant will prepare a Soil Sampling and Contaminated Soils Contingency Plan that would outline procedures for testing soils in locations where contaminated soils are suspected to be present including the office building and Central Compressor Station site locations. The Soil Sampling and Contaminated Soils Contingency Plan will also outline the steps that would be implemented if contaminated soils are encountered during preconstruction soil sampling and testing or if they are encountered at any point during construction. Provisions outlined in this plan would include phone numbers of city, county, state, and federal agencies and primary, secondary, and final cleanup procedures. In	Revise as follows: "MM HZ-1: <del>Soil Sampling and Contaminated Soils Contingency Plan</del> . The applicant will prepare a <del>Soil Sampling and Contaminated Soils Contingency Plan</del> that would outline procedures for testing soils in locations where contaminated soils are suspected to be present including the office building and Central Compressor Station site locations. The <del>Soil Sampling and Contaminated Soils Contingency Plan</del> will also outline the steps that would be implemented if contaminated soils are encountered during preconstruction soil sampling and testing or if they are encountered at any point during construction. Provisions outlined in this plan would include phone numbers of city, county, state, and federal agencies and primary, secondary, and final cleanup procedures. In	Assessment of soil in <b>MM HZ-1: Soil Sampling and Contaminated Soils Contingency Plan</b> should be limited to areas that will be disturbed during construction. O2-30  Soil Sampling Plan should be removed from the MM based on existing geotechnical analysis and report. Since environmental soil sampling and testing were completed as part of the geotechnical investigation, the analysis and report supersede the need for a soil sampling plan. Applicant will prepare a Contaminated Soils Contingency Plan. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter.

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				would include phone numbers of city, county, state, and federal agencies and primary, secondary, and final cleanup procedures. In addition, the plan would address health and safety procedures to minimize environmental impacts in the event that hazardous soils or other materials are encountered during construction of the project, including measures such as worker training, containerization and storage, and monitoring...	addition, the plan would address health and safety procedures to minimize environmental impacts in the event that hazardous soils or other materials are encountered during construction of the project, including measures such as worker training, containerization and storage, and monitoring...
17	Executive Summary	ES-49	n/a	"2. Equipment shall include: ... b) One shovel and one pressurized chemical fire extinguisher for each gasoline-powered tool, including but not restricted to compressors, hydraulic accumulators, gardening tools (such as chain saws and weed trimmers), soil augers, rock drills, etc."	Revise as follows: "2. Equipment shall include: ... b) One shovel and one pressurized chemical fire extinguisher for each gasoline-powered tool, including but not restricted to compressors, hydraulic accumulators, gardening tools (such as chain saws and weed trimmers), soil augers, rock drills, etc."
					APM HZ-8: Construction Fire Control and Emergency Response Measures requiring one shovel and one pressurized chemical fire extinguisher for each gasoline-powered tool, including but not restricted to compressors, hydraulic accumulators, gardening tools (such as chain saws and weed trimmers), soil augers, rock drills, etc., is infeasible and should be deleted. In addition, this is not an APM as the applicant did not propose this measure; therefore this should be a mitigation measure.
					The applicant provided comments to APM HZ-8 on 12/8/11, as presented below, which are not consistent with the APM as presented in the DEIR.
					"To address the risk of fire during construction of the proposed project components, the applicant and SCE will develop fire management measures as part of Construction Safety and Emergency Response Plans developed in consultation with their



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					<p>contractors for use during construction and operation of the proposed project components. The Plans will include notification procedures and emergency fire precautions, such as the following:</p> <ul style="list-style-type: none"> <li>• The assignment of Fire Risk Manager who would be present at each proposed project component area during construction activities and whose sole responsibility would be to monitor the contractor's fire-prevention activities;</li> <li>• The equipping of all internal combustion engines, stationary and mobile, with spark arresters meeting applicable regulatory standards;</li> <li>• The prohibition of smoking at each construction job site, and the posting of no smoking signs and fire rules on the project bulletin board at all contractor field offices and areas visible to employees during fire season;</li> <li>• The clearing of all extraneous flammable materials from equipment staging areas;</li> <li>• The installation of fire extinguishers at the proposed Central Compressor Station site; and</li> <li>• The provision of fire-fighting equipment such as extinguishers and shovels, and the training of construction employees on the use of this equipment and on how to communicate with local fire departments;</li> <li>• The provision of portable communication devices (i.e., radio or mobile telephones) to construction personnel; and</li> <li>• Any additional measures as needed during</li> </ul>

O2-31  
Cont.

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					<p>construction to address fire prevention and detection, to lower the risk of wildland fires.</p> <p>The Construction Safety and Emergency Response Plans will include additional, special provisions for days when the National Weather Service issues a Red Flag Warning. Standard protocols implemented during these periods will include:</p> <p>O2-31 Cont.</p> <ul style="list-style-type: none"> <li>• Measures to address storage and parking areas;</li> <li>• Measures to address the use of gasoline-powered tools;</li> <li>• Procedures for road closures as necessary;</li> <li>• Procedures for use of a fire guard as necessary;</li> <li>• Additional fire suppression tools and fire suppression equipment, and training requirements.</li> </ul> <p>See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter.</p>
18	Introduction	1-1	17-18	"The proposed project is located in an unincorporated area of Los Angeles County and northern Los Angeles, California."	<p>Revise as follows: <u>"The proposed project is located in an unincorporated area of Los Angeles County and northern Los Angeles, California. These components of the proposed project are mostly located in an unincorporated area of Los Angeles County. A small portion of the guard shack component is located in the northern area of the City of Los Angeles."</u></p>
19	Introduction	1-1	41	"Southern California Gas Company (the applicant) provides natural gas services to approximately six million customers in Southern California, and operates four storage fields to meet customer demand."	<p>Under the heading <b>1.0 Introduction</b>, the text should be revised to accurately describe the location of project components.</p> <p>O2-32</p> <p>Under the heading <b>Introduction and Project Overview</b>, the number of customers receiving service from Southern California Gas Company is inaccurate and should be updated to reflect service area.</p> <p>O2-33</p>

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20	Introduction	1-2	12-17	<p>"The proposed compressors would also improve natural gas service reliability and efficiency. The existing gas turbine-driven compressors at the storage field were installed in 1971. Gas turbines alter compressor speed by varying fuel input. The new variable-speed motors that would be installed as part of the proposed project have the ability to alter compressor speed as gas pressure ratios and flow rates change more precisely than the existing gas turbines. Hence, the new motors would be capable of better matching operating pressures at the storage field and would be more energy efficient."</p>	<p>Revise as follows:            "The proposed <del>compressors</del> project would also improve natural gas service reliability and efficiency. The existing gas turbine-driven compressors at the storage field were installed in 1971. Gas turbines alter compressor speed by varying fuel input. The new <del>electric-driven</del>, variable-speed <del>motors</del> compressors that would be installed as part of the proposed project have the ability to alter compressor speed as gas pressure ratios and flow rates change more precisely than the existing gas turbines. Hence, the new <del>motors</del> compressors would be capable of better matching operating pressures at the storage field and would be more energy efficient."</p>	<p>Under the heading 1.1.1, Settlement Agreement, the text inaccurately describes the project versus the compressors. The combined project would improve reliability and efficiency, not just the compressors. This is a <b>GLOBAL COMMENT</b></p> <p>O2-34</p>
21	Introduction	1-3	20	<p>"The CPUC conducts two parallel processes when considering any application for approval of a CPCN: an application process similar to a court proceeding, in which the CPUC considers whether the expansion is needed and is in the public interest; and an environmental review process under the California Environmental Quality Act (CEQA)."</p>	<p>Revise as follows:            "The CPUC conducts two parallel processes when considering any application for approval of a CPCN: an application process similar to a court proceeding, in which the CPUC considers whether the <del>expansion</del> proposed project is needed and is in the public interest; and an environmental review process under the California Environmental Quality Act (CEQA)."</p>	<p>Under the heading 1.3 CPUC Processes and Intended Uses of the EIR, the text inconsistency references the project as an expansion; the project should be referred to as a "proposed project."</p> <p>O2-35</p>
22	Introduction	1-3	2 <sup>nd</sup> paragraph, line 36	<p>"... Additional environmental analysis may be required in instances where, as a result of refined engineering design, anticipated construction activities vary significantly from those described in the EIR..."</p>	<p>Add text as follows (following line 36):            "The CPUC would review any design changes to the project that occurred between the preliminary and final designs. These changes would be evaluated for potential environmental impacts. SOE would conduct environmental..."</p>	<p>Under the heading 1.3 CPUC Process and Intended Use of EIR, text following the 2<sup>nd</sup> paragraph should be included to accurately describe the process associated with changes in the project description.</p> <p>O2-36</p>

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					surveys, as appropriate, for any new disturbance areas. If necessary, SCE would also implement the relevant APMs or MMs to ensure that potential impacts are less than significant."
23	Project Description	2-1	13	"The construction of the proposed project would expand the Aliso Canyon Natural Gas Storage Field's (storage field's) natural-gas injection capacity from approximately 300 million cubic feet (cf) per day to approximately 450 million of per day."	Revise as follows: "The construction of the proposed project would expand the Aliso Canyon Natural Gas Storage Field's (storage field's) natural-gas injection capacity from approximately 300 million standard cubic feet (scf) per day to approximately 450 million scf per day."
24	Project Description	2-1	Footnote 2	Footnote 2 "The initial build of the Natural Substation would include installation of two 28 MVA, 66/12-kV transformers. Space would be available on for the installation of two additional 28 MVA transformers (for a total of 112 MVA) if needed in the future."	Revise as follows: "The initial build of the Natural Substation would include installation of two 28 MVA, 66/12-kV transformers. Space would be available on for the installation of two additional spare 28 MVA transformers <del>for a total of 112 MVA</del> , if needed in the future."
25	Project Description	2-2	2	"In addition, the applicant would apply..."	Revise as follows: "In addition, the applicant <del>would apply</del> <u>has applied</u> ..."
26	Project Description	2-3	Figure 2-3		Revise Figure 2-3 – see comments
27	Project Description	2-4	n/a		Revise Figure 2-4 – see comments.

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						Please see revised Figure 2-4 as provided in Exhibit O2-41 A-3 of the accompanying cover letter. Cont.
28	Project Description	2-10	12	"Water, sediment, liquid hydrocarbons, and other chemicals..."	Revise as follows: "Water, sediment, oil and liquid hydrocarbon condensates, and other chemicals..."	Under the heading <b>2.1.1 Storage Field Operations and Technical Details</b> , the phrase "other chemicals" does not accurately characterize withdrawn materials and should be deleted. Hydrocarbon condensate more accurately describes withdrawn materials. O2-42
29	Project Description	2-10	28	"Each compressor generates 15,000 horsepower"	Revise as follows: "Each compressor is ISO rated at <b>generates</b> 15,000 horsepower..."	Under the heading <b>2.1.1.1 Natural Gas Injection and Withdrawal</b> , the current description of compressor horsepower is not accurately described and should reference the ISO rating. O2-43
30	Project Description	2-10	36	"Water, sediment, and other chemicals, including oil and other hydrocarbons..."	Revise as follows: "Water, sediment, oil, and other chemicals, including oil and other liquid hydrocarbon condensates..."	Under the heading <b>2.1.1.1 Natural Gas Injection and Withdrawal</b> , the phrase "other chemicals" does not accurately characterize withdrawn materials and should be deleted. Hydrocarbon condensate more accurately describes withdrawn materials. O2-44
31	Project Description	2-10	48-50	"Four 500-kilowatt, 16-kV gas-driven generators are available to provide electricity if electrical power is lost at the storage field. The generators provide enough electricity to run operational controls, natural gas processing (dehydration), and other support activities prior to discharging natural gas into delivery pipelines. With the gas-driven generators and gas-turbine driven compressors, injection and withdrawal activities are able to continue operating at full capacity during a loss of electrical power to the storage field."	Revise as follows: "Four 500-kilowatt, 16-kV gas-driven generators are available to provide electricity if electrical power is lost at the storage field. The generators provide enough electricity to run operational controls, natural gas processing (dehydration), and other support activities prior to discharging natural gas into delivery pipelines. With the gas-driven generators and gas-turbine driven compressors, injection and withdrawal activities are able to continue operating at full capacity during a loss of electrical power to the storage field. The number of generators continuously operating is dependent upon power requirements needed to provide"	Under the heading <b>2.1.1.2 Electrical Power and Backup Generators</b> , the text should be revised to accurately describe existing power generating conditions. O2-45

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					electricity to the office, controls, and blackstart capacity for dehydration upon withdrawal and for the existing IDC driven compressors for compression."	O2-45 Cont.
32	Project Description	2-11	8-17	"The proposed project area includes the 3,600-acre storage field in unincorporated Los Angeles County and the City of Los Angeles...."	Revise as follows: "The proposed project area is located within includes the 3,600-acre storage field in unincorporated Los Angeles County and the City of Los Angeles..."	O2-46
33	Project Description	2-11	25	"Segment A, from Tap Point A to the proposed Natural Substation, is a single-circuit line that would be reconducted. New fiber optic cable would also be installed on Segments A, B, and C."	Revise as follows: "Segment A, from Tap Point A to the proposed Natural Substation, is a single-circuit line that would be reconducted. New fiber optic cable would also be installed on Segments A, B, and C."	O2-47
34	Project Description	2-11	Footnote 4	"Footnote 4, 'Segments A and C form a double-circuit, alternating-current subtransmission line with six conductors (three conductors on each side of each structure supporting the line). Each set of three conductors forms one circuit.'"	Revise as follows: "4 Segments A and C form a double-circuit, alternating-current subtransmission line with six conductors (three conductors on each side of each structure supporting the line). Each set of three conductors forms one circuit."	O2-48
35	Project Description	2-14	31	"The three electric-driven, variable-speed compressors installed in the proposed Central Compressor Station would each have 22,000 horsepower..."	Revise as follows: "The three electric-driven, variable-speed compressors installed in the proposed Central Compressor Station would each have approximately 22,000 horsepower..."	O2-49
36	Project Description	2-14	32-33	"Combined, the compressors would be capable of compressing a total of approximately 450 million standard cf of	Revise as follows: "Combined, the compressors would be capable of compressing a total of approximately 450 to 600	O2-50

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				natural gas per day."	million standard cf of natural gas per day."
37	Project Description	2-14	44-46	"Metering refers to monitoring the flow rate of natural gas withdrawal and injection. Metering and control of the three new electric-driven, variable-speed compressors would be conducted from the existing onsite operations facility at the Plant Station site."	Revise as follows: "Metering refers to monitoring the measurement of the flow rate of natural gas withdrawal and injection. Metering and control of the three new electric-driven, variable-speed compressors would be conducted from the new existing onsite operations facility at the Plant Station site."
38	Project Description	2-17	35-36	"The pipelines would be installed above grade on pipe supports or below grade in existing trenches (Figure 2-3)."	Revise as follows: "The pipelines would be installed above grade on pipe supports or buried below grade <del>in existing trenches</del> (Figure 2-3)."
39	Project Description	2-18	23-25	"Several new office buildings are proposed for construction within the northern part of the Plant Station site: a 4,500-square-foot office building, two archive storage sheds totaling approximately 1,500 square feet, and a 1,600-square-foot crew-shift building (for a total of 7,600 square feet of new office facilities)."	Revise as follows: "Several new office buildings are proposed for construction within the northern part of the Plant Station site: a footprint of 4,500 square-foot office building, two archive storage sheds with a footprint totaling approximately 1,500 square feet, and a 1,600-square-foot crew-shift building for a total footprint of 7,600 square feet of new office facilities). Two main buildings are proposed for construction within the northern part of the Plant Station site. The existing 4,500 square foot modular office and the two archive storage sheds, totaling 1,500 square feet will be replaced by one new steel office building with a 6,000 square foot footprint. The existing 1,600 square foot modular crew shift building will be replaced with a new steel crew shift building with a 1,600 square foot footprint."
					accuracy of existing conditions.
					Under the heading 2.2.1.2 Metering, Control, Safety, and Pressure Relief, the text should be revised to accurately describe the process of metering, which includes measurements. Metering will take place at the New Compressor Station, as provided in the August 24 SoCalGas Memo to CPUC.
					Under the heading 2.2.1.3 New Pipelines, revise text to clarify that pipelines would be above grade or buried.
					Under the heading 2.2.3 Office and Crew-shift Buildings, the text should be revised to accurately describe the size and footprint of the applicable facilities.

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40	Project Description	2-18	41	"A new, 164-square-foot guardhouse and access gate would be constructed within the storage field property boundary approximately 500 feet north..."	Revise as follows: "A new, 164-square-foot guardhouse and access gate would be constructed within the storage field property boundary approximately <del>500</del> 200 feet north..."	Under the heading 2.2.4 Guardhouse and Entry Road Widening, the distance presented for the relocation of the guard house is inaccurate and should be revised. O2-54
41	Project Description	2-19	12	"Avenue/Limekiln Canyon Road) would be widened by 12 feet for approximately 500 feet leading up..."	Revise as follows: "Avenue/Limekiln Canyon Road) would be widened by 12 feet for approximately <del>500</del> 200 feet leading up..."	Under the heading 2.2.4 Guardhouse and Entry Road Widening, the distance presented for total road widening is inaccurate and should be revised. O2-55
42	Project Description	2-19	25	"The Plant Power Line would be approximately 1,200-feet..."	Revise as follows: "The Plant Power Line would be approximately 1,800-1,200-feet..."	Under the heading 2.2.5 12-kV Plant Power Line, the length of the line is inaccurate and should be revised. O2-56
43	Project Description	2-19	39	"...the substation site for the installation of two additional 28 MVA transformers (for a total of 112 MVA),	Revise as follows: "...the substation site capable of carrying <del>for the</del> installation of two spare additional 28 MVA transformers <del>(for a total of 112-56 MVA),</del> ..."	Under the heading 2.2.6 Natural Substation, the transformer capacity (MVA) is inaccurate and should be revised. This is a GLOBAL COMMENT. O2-57
44	Project Description	2-19	43	"...reducing any downtime that might be experienced by the Plant Station in the event of a substation failure."	Revise as follows: "...reducing any downtime that might be experienced by the Plant Station in the event of a substation transformer failure."	Under the heading 2.2.6 Natural Substation, the discussion of power failure is incorrectly described and should be revised. O2-58
45	Project Description	2-20	Table 2-1	"The initial build of the Natural Substation would include the installation of two 28 MVA, 66/12-kV transformers. Space would be available for the installation of up to two additional 28 MVA transformers (for a total of 112 MVA)	Revise as follows: "The initial build of the Natural Substation would include the installation of two 28 MVA, 66/12-kV transformers. Space would be available on for the installation of two <del>additional</del> spare 28 MVA transformers <del>(for a total of 112 MVA),</del> if needed in the future."	In Table 2-1, in the "Description" column for the row titled "28 MVA Transformers," the transformer capacity (MVA) is inaccurate and should be revised. This is a GLOBAL COMMENT. O2-59
46	Project	2-31	41	"...project is anticipated to take 22 months	Revise as follows:	Under the heading 2.3.1 Construction Schedule. O2-60



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				(Table 2-5), starting August 2012."	"...project is anticipated to take approximately 22 months (Table 2-5) -starting August 2012."
					Revise as follows: "Construction is anticipated to start in August late 2012 or early 2013. The project schedule for the ACTR project is planned for commissioning 36 months after the CPUC final decision. The Central Compressor Station has a scheduled timeline of 30 months. After detailed engineering and equipment selection, there will be a 22-24 month of actual on-the-ground construction at the Central Compressor Station. Office crew shift buildings and guard house relocation would start construction as soon as possible after the CPUC decision so as to be completed prior to Central Compressor Station on-site construction. The buildings and the guard house construction are estimated to take 3-4 months, but would not be concurrent with the Central Compressor Station construction schedule. Conceptual construction phasing is provided in Table 2-6. A list of equipment required for construction of the proposed project is provided in Appendix G."
47	Project Description	2-32	Table 2-5 and Table 2-6	"Construction is anticipated to start in August 2012. Conceptual construction phasing is provided in Table 2-6. A list of equipment required for construction of the proposed project is provided in Appendix G."	Under the heading 2.3.1 Construction Schedule, Personnel, and Equipment, Tables 2-4 and 2-6 along with the text present an infeasible implementation schedule. Revise Table 2-5 and 2-6 to be consistent with recommended text revision.
48	Project Description	2-32	21-22	"Construction of the proposed project would result in the permanent disturbance of approximately 26 acres of land (Table 2-7). Approximately 90 percent of this land has been previously disturbed."	Under the heading 2.3.2 Land Disturbance, revise Table 2-7 and information to reflect what should be studied under CEQA, which are potential impacts caused to new permanently disturbed areas. As written, the text implies we are creating much more new disturbance than we actually are. Revised Table 2-7 is provided in Exhibit A-4 of the

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					percent of this land has been previously disturbed"	accompanying cover letter. O2-62 Cont.
49	Project Description	2-36	8	"If additional areas are required for the proposed project that may result in land disturbance other than that identified in Table 2-7, additional environmental analysis may be required."	Revise as follows: "If additional areas are required for the proposed project that may result in land disturbance other than that identified in Table 2-7, additional environmental analysis may be required." "The CPUC would review any design changes to the project that occurred between the preliminary and final designs. These changes would be evaluated for potential environmental impacts. SCE would conduct environmental surveys, as appropriate, for any new disturbance areas. If necessary, SCE would also implement the relevant APMs or MMs to ensure that potential impacts are less than significant."	Under the heading 2.3.2.1 <b>Additional Environmental Analysis</b> , additional text should be added to provide clarification on the project resulting from changes in the project description, as presented in the DEIR. O2-63
50	Project Description	2-39	40-41	"Approximately 1,600 linear feet of trenches would be excavated for fiber optic cable installation and up to 210 cubic yards of soil and other material would be excavated as part of this trenching."	Revise as follows: "Approximately 1,600 linear feet of trenches would be excavated for fiber optic cable installation and up to 210 cubic yards of soil and other material would be excavated as part of this trenching."	Under the heading 2.3.3.7 <b>Hazardous Waste</b> , excavated soil should not be characterized as non-hazardous waste as it can be reused onsite for other purposes. The referenced text should be deleted. O2-64
51	Project Description	2-41	41	"The existing entry road to the storage field road would be widened by approximately 12 feet for 42 approximately 500 feet between..."	Revise as follows: "The existing entry road to the storage field road would be widened by approximately 12 feet for approximately 500 200 feet between..."	Under the heading 2.3.7 <b>Guardhouse Construction and Entry Road Widening</b> , revise text to accurately reflect length of road widening consistent with the building permit application. O2-65
52	Project Description	2-42	11	"The 12-kV Plant Power Line (1,200 feet long) would be constructed pursuant to	Revise as follows: "The 12-kV Plant Power Line (4,200 1,800 feet	Under the heading 2.3.8 <b>12-kV Plant Power Line Construction</b> , the length of the PPL is inaccurate and should be updated consistent with the project O2-66

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				applicable CPUC requirements including..."	long) would be constructed pursuant to applicable CPUC requirements including..."
53	Project Description	2-52	15-16	<ul style="list-style-type: none"> <li>Oil recovery from natural gas processing: 200 barrels per day (2006 estimate);</li> <li>Water recovery from natural gas processing: 300 barrels per day (2006 estimate);</li> </ul>	<p>Remove the following bullet items from the list: <del>Oil recovery from natural gas processing: 200 barrels per day (2006 estimate);</del></p> <ul style="list-style-type: none"> <li><del>Water recovery from natural gas processing: 300 barrels per day (2006 estimate);</del></li> </ul>
54	Project Description	2-52	26-42	<p>"Average quantities of hazardous waste from storage field operations are as follows:</p> <ul style="list-style-type: none"> <li>Oil recovery from natural gas processing: 200 barrels per day (2006 estimate);</li> <li>Water recovery from natural gas processing: 300 barrels per day (2006 estimate);</li> </ul> <p>The following types and quantities of hazardous waste are estimated for operation of the proposed Natural Substation:</p> <ul style="list-style-type: none"> <li>Transformer oil: 6,740 gallons per year;</li> <li>Sulfur hexafluoride: 328 cf per year;"</li> </ul>	<p>Revise as follows:</p> <p>"Average quantities of hazardous waste from storage field operations are as follows:</p> <ul style="list-style-type: none"> <li><del>Oil recovery from natural gas processing: 200 barrels per day (2006 estimate);</del></li> <li><del>Water recovery from natural gas processing: 300 barrels per day (2006 estimate);</del></li> </ul> <p>The following types and quantities of hazardous waste are estimated for operation of the proposed Natural Substation:</p> <ul style="list-style-type: none"> <li><del>Transformer oil: 6,740 gallons per year;</del></li> <li><del>Sulfur hexafluoride: 328 cf per year;"</del></li> </ul>
55	Project Description	2-53	19-28	<p>"The storage field's backup generators, which are described in Section 2.1.1.2, would also provide emergency power for the new compressor station...."</p> <p>Withdrawal from the storage field, however, would not be affected because energy for the withdrawal of natural gas is provided by the pressure and expansion of gas within the storage reservoir and no additional</p>	<p>Revise as follows:</p> <p>"<del>The storage field's backup generators, which are described in Section 2.1.1.2, would also provide emergency power for the new compressor station ....</del></p> <p>Withdrawal from the storage field, however, would not be affected because energy for the withdrawal of natural gas is provided by the pressure and expansion of gas within the storage reservoir and</p>
					<p>Under the heading 2.4.2 Nonhazardous and Hazardous Waste, as described in lines 8-11, oil and water recovered are not disposed as hazardous waste; remove from the bulleted list for clarification</p> <p>Under the heading 2.4.2 Nonhazardous and Hazardous Waste, the text incorrectly lists some materials as hazardous waste verses hazardous materials that are on-site. And some wastes are not or may not be classified as hazardous. Revise accordingly.</p> <p>Under the heading 2.4.4 Loss of Electrical Power: Effects on Injection and Withdrawal, the text inaccurately describes existing conditions and should be revised.</p>

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				energy is needed to withdraw the gas."	electricity produced from the current generators are used during withdrawal, and no additional energy is needed to withdraw the gas."	O2-69 Cont.
56	Project Description	2-53	43	<ul style="list-style-type: none"> <li>Hydrostatic Test Water Management Plan (construction);</li> </ul>	<p>Revise as follows: "</p> <ul style="list-style-type: none"> <li>Hydrostatic Test Water Management Plan (construction);"</li> </ul>	Under the heading <b>2.5 Plans and Applicant Proposed Measures</b> , the project will comply with a general discharge permit for discharges; therefore, <b>O2-70</b> a Hydrostatic Test Water Management Plan is not necessary and should be deleted.
57	Project Description	2-54	Table 2-9	"Air Quality Management District's Rule 43 (Fugitive Dust Regulations)."	Revise as follows: "Air Quality Management District's Rule 43 <u>403</u> (Fugitive Dust Regulations)."	In <b>Table 2-9, APM AQ-3</b> , the regulatory reference presented is inaccurate; SCAQMD's Fugitive Dust Rule is 403, not 43. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter. <b>O2-71</b>
58	Project Description	2-54	Table 2-9	"The applicant will post signs in the storage field along designated travel routes and limiting traffic to 15 miles per hour or less"	Revise as follows: "The applicant will post signs in the storage field along designated travel routes and limiting traffic to 15 miles per hour or less on unpaved roads."	In <b>Table 2-9, APM AQ-5</b> should be revised to accurately describe the area, unpaved roads, where the 15 mile limit will be imposed. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter. <b>O2-72</b>
59	Project Description	2-54	Table 2-9	"During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), the applicant and SCE will ensure that all clearing, grading, earth moving, and excavation operations will be curtailed to the degree necessary to prevent fugitive dust created by onsite activities and operations from being a nuisance or hazard, either onsite."	Revise as follows: "During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), the applicant and SCE will ensure that all clearing, grading, earth moving, and excavation operations during project construction will be curtailed to the degree necessary to prevent fugitive dust created by onsite activities and operations from being a nuisance or hazard, either offsite or onsite."	In <b>Table 2-9, APM AQ-6</b> , clarifying text should be added to describe construction activities warranting implementation of the APM. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter. <b>O2-73</b>
60	Project Description	2-54	Table 2-9	"Biological monitoring will be conducted during construction work in areas in close	Revise to reflect biological resource related APMs (APM-BR-01, APM-BR-03, APM-BR-04, APM-BR-	In <b>Table 2-9, APM BR-1</b> , this proposed APM combines the PEA's APMs for pre-con surveys. <b>O2-74</b>

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				proximity to native habitat to assure project compliance with all APMs and Mitigation Measures."	05, described in the Proponent's Environmental Assessment
					exclusionary fencing, construction monitoring and nesting bird surveys into one APM. Combining multiple APMs into one can result in confusion, misinterpretation and negatively affect implementation feasibility. Revised Table ES-1 is provided in Exhibit A-1 of the accompanying cover letter.
61	Project Description	2-55	Table 2-9, APM BR-4	"The applicant and SCE will ensure that protocol-level pre-construction surveys will be conducted for coastal California gnatcatcher, in project component areas where suitable habitat exists and for all project activities proposed within U.S. Fish and Wildlife Service designated critical habitat in accordance.... Areas of 2 or more contiguous acres of suitable coastal California gnatcatcher habitat will be identified at the time of pre-construction surveys and work within or near these areas will be performed outside of the breeding and nesting season...."	In Table 2-9, APM BR-4, protocol surveys "for all project activities proposed within USFWS designated critical habitat" is not justified because many of these areas are disturbed or are otherwise unsuitable to support presence of gnatcatcher. This APM should only apply to suitable gnatcatcher habitat. In addition, construction should be allowed in gnatcatcher habitat during breeding season if surveys confirm the absence of breeding gnatcatchers or if adequate protective buffers can be maintained. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter
62	Project Description	2-55	Table 2-9, APM BR-7	<b>Wildlife Relocation and Protection.</b> During construction activities, wildlife resources that are not considered to have special status and are determined to be in harm's way may be relocated by the applicant and SCE and/or their construction contractors to native habitat near the work area but outside the construction impact zone in order to avoid injury or mortality.	In Table 2-9, APM BR-7, this APM should be divided into two APMs. One to address wildlife relocations and one to address open trenches. In addition, backfilling within 72 hours of pipeline installation is an infeasible timeframe and should be deleted. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter

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				For the trench to be excavated in the area of the Central Compressor Station during construction for the purposes of pipeline installation, the applicant will ensure that backfilling of the trench would occur within 72 hours of pipeline installation to preclude potential impacts to wildlife that may fall into the trench. At the conclusion of each day's trenching activity, the end of the trench would be left ramped at an approximate 2- to-1 slope to allow any wildlife falling into the trench to escape.	O2-76 Cont.
63	Project Description	2-56	Table 2-9, APM BR-8	<p><b>"Oak Tree Impact Avoidance.</b> In accordance with City of Santa Clarita/Los Angeles County ordinance and policy, the applicant and SCE will ensure that loss or impacts to all native oak trees via trimming or ground disturbance within the dripline (i.e., the outermost extent of the canopy) will be avoided using specific measures and/or agency guidance. The applicant and SCE will ensure that loss or impacts to all native oak trees via trimming or ground disturbance within the dripline (i.e., the outermost extent of the canopy) will be avoided using specific measures and/or agency guidance. All activities that have the potential to adversely affect oak trees (i.e., trimming, excavation, paving, removal) will be monitored by a qualified arborist. If impacts cannot be avoided, the applicant or SCE will replace damaged or removed oak trees at a 2:1 ratio. Plantings will be 15 gallon containers in areas deemed suitable by the arborist. If impacts cannot</p>	<p>O2-77</p> <p>Under the heading <b>Oak tree Impact Avoidance</b>, the text describes measures to be implemented by SCE and the applicant. However, the CPUC is vested with jurisdiction over the project. As such, local agencies are pre-empted from exercising discretionary land use permitting authority over the proposed project. Because of this, the applicant should not be required to secure separate discretionary permits from local city or county agencies prior to construction. This APM was also revised in a manner inconsistent with SoCalGas's comments. Los Angeles County's Oak Tree Permit, while containing some non-discretionary procedures to securing a permit, also contains discretionary permitting elements to it. As a consequence, the APM, as written could inadvertently require SoCalGas to proceed with a discretionary permitting that contravenes the CPUC's authority.</p> <p>See revised Table ES-1 as provided in Exhibit A-1</p>

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					be avoided, the applicant or SCE will submit an Oak Tree Permit Application (including an Oak Tree Report) to Los Angeles County and obtain an Oak Tree Permit prior to construction.	O2-77 Cont.
64	Project Description 2.6	2-63	Table 2-10	"Table 2-10, Permit to Construct, Permit to Operate, Permit for Alteration/Modification, Emission Reduction Credits, Rule 403 Permit (Fugitive Dust)"	Revise as follows: "Permit to Construct, Permit to Operate, Permit for Alteration/Modification, Emission Reduction Credits, Rule 403 Permit (Fugitive Dust)"	In Table 2-10, the presented air permits do not apply to any of the proposed project components and should be deleted.
65	Project Description	2-63	Table 2-10		Revise Table 2-10 per the comment provided	In Table 2-10, the Los Angeles Regional Water Quality Control Board is a state agency and therefore should be moved under the State Agency category
66	Alternatives 3.3.3.2	3-9	Figure 3-1		Revise Figure 3-1, see comments	In Figure 3-1, the label for the line representing the underground segment is inaccurate; the line is significantly longer than 1,000 ft. Revise figure to scale.
67	Aesthetic Resources 4.1.1.3	4.1-3	Table 4.1-1		Revise Table 4.1-1 per comments provided	In the Table 4.1-1, Sensitive Viewer Groups in the Vicinity of the Proposed Project Components the column titled "Viewer Sensitivity" should be moved adjacent to the column titled "Viewer Groups" to provide clarification on sensitivity from the group.
68	Aesthetic Resources 4.1.1.3	4.1-5	Figure 4.1-1		Revise Figure 4.1-1 per comments provided	In Figure 4.1-1, O'Melveny Park is not presented; however, there is a visual simulation provided from this park. In addition, Sesnon Blvd is not a state designated scenic highway but is presented as such in the figure. Revise accordingly with accurate designation.

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69	Aesthetic Resources 4.1.2.3	4.1-7	26-48			The <b>Regional and Local</b> section of the <b>Regulatory Setting</b> does not include any aesthetic-related discussion or policies for the additional jurisdictions potentially impacted by Telecommunication Routes #2 and #3.  Add discussion/policies related to Ventura County, City of Simi Valley, and City of San Fernando.  NOTE: Designated scenic vistas, resources, or highways, and associated policies from these additional jurisdictions may require further discussion in the impacts section. Identification of such additional resources should also be included on Figure 4.1-1.  O2-83
70	Aesthetic Resources 4.1.2.3	4.1-8	1-2	"The Scenic Highway Element of the existing adopted General Plan identifies the portion of I-5 in the vicinity of the proposed project as proposed for further first priority"	Revise as follows: "The Scenic Highway Element of the existing adopted General Plan identifies the portion of I-5 in the vicinity of the proposed project as proposed for further evaluation for with first priority"	Under the heading <b>County of Los Angeles General Plan</b> , specific words are missing from the sentence, which should be added for clarification.  O2-84
71	Aesthetic Resources 4.1.3.1	4.1-9	26	"[visual] simulations were prepared for five of the viewpoints . . ."	Revise as follows: "[visual] simulations were prepared for five <del>six</del> of the viewpoints . . ."	Under the heading <b>4.1.3.1 Methodology</b> , the text inaccurately references five viewpoints; there are six viewpoints. The text should be revised for accuracy.  NOTE: This change needs to be made throughout the section (and throughout the document, if referenced elsewhere).  O2-85
72	Aesthetic Resources	4.1-11	Figure 4.1-2	"Aliso Canyon Plant Power Station"	Revise as follows: " <del>Aliso Canyon Plant Power Station</del> Existing <u>Aliso Canyon Plant Station</u> "	In <b>Figure 4.1-2</b> , the label for the existing injection and withdrawal facilities currently states "Aliso Canyon Plant Power Station"; this is inaccurate and should be revised.  In addition, Sesnon Blvd is not a state designated scenic highway and should be revised on the figure  O2-86



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73	Aesthetic Resources 4.1.4	4.1-24	15	"Figure 4.1-9"	Revise as follows: "Figure 4.1-9 <del>10</del> "	and legend. Under the heading <b>Operation</b> , the text incorrectly references Figure 4.1-9; the correct reference is Figure 4.1-10. O2-86 Cont. O2-87
74	Aesthetic Resources 4.1.4	4.1-25	24-26	"Figures 4.1-3 through 4.1-11 depict photographs of the 10 selected existing views as well as simulated views of the proposed project for five of the viewpoint locations."	Revise as follows: "Figures 4.1-3 through 4.1-11 depict photographs of the 10 selected existing views as well as simulated views of the proposed project for <del>five six</del> of the viewpoint locations."	<b>Figures 4.1-3 through 4.1-11</b> the text inaccurately references five viewpoints; there are six viewpoints. The text should be revised for accuracy. O2-88
75	Aesthetic Resources 4.1.4	4.1-25	37	"An existing 1,500-foot dirt road to the proposed Natural Substation site would be graded, paved, and widened from 12 to 18 feet, and a new 18-inch access road would be constructed from the Aliso Canyon Plant Station to the mid-point of the Plant Power Line."	Revise as follows: "An existing 1,500-foot dirt road to the proposed Natural Substation site would be graded, paved, and widened from 12 to 18 feet, and a new 18-inch access road would be constructed from the Aliso Canyon Plant Station to the mid-point of the Plant Power Line."	Under the heading <b>Operation</b> , reference to the 18-inch access road should be changed to 18-foot-wide access road. O2-89
76	Aesthetic Resources 4.1.4	4.1-27	Figure 4.1-4		Revise the impact discussion related to the fiber optic line as part of Viewpoint 2.	The discussion for <b>Figure 4.1-4, Viewpoint 2</b> inaccurately describes that the fiber optic line would be underbuilt; this is not consistent with the project description and should be revised for accuracy. Also, the telecommunications line is shown as underbuilt in Figure 4.1-4. This matches the text in the section but conflicts with Figure 2-11 in Section 2.0, Project Description. O2-90
77	Aesthetic Resources 4.1.4	4.1-27	Figure 4.1-5		Revise the impact discussion related to the fiber optic line as part of Viewpoint 3.	The discussion for <b>Figure 4.1-5, Viewpoint 3</b> inaccurately describes that the fiber optic line would be underbuilt; this is not consistent with the project description and should be revised for accuracy. Also, the telecommunications line is shown as underbuilt in Figure 4.1-5. This matches the text in

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					the section but conflicts with Figure 2-11 in Section 2.0, Project Description. O2-91 Cont.
78	Aesthetic Resources 4.1.4	4.1-28	Figure 4.1-6		Revise the impact discussion related to the fiber optic line as part of Viewpoint 4. O2-92
79	Aesthetic Resources 4.1.4	4.1-29	29	"Viewpoint 6 shows existing conditions and a simulation of the project . . ."	Revise as follows: "Viewpoint 6Z shows existing conditions and a simulation of the project . . ."
80	Aesthetic Resources 4.1.4	4.1-31	13-19	"The fiber optic line that would be underbuilt on the towers at this location would not be distinguishable from the transmission conductor due to distance and the fact that the telecommunications line would be smaller than the transmission conductor it would be attached to. Overall, the general visual character of the view would not change, as the appearance of electrical infrastructure within an urban environment would continue to dominate the view. Therefore, from this view location, the change in visual character and quality resulting from proposed project is less than significant under this criterion."	Revise as follows: "Implementation of the proposed project would require electrical upgrades, new fiber optic cable, and one LST to be replaced with two TSPs within the San Fernando Substation. The fiber optic line that would be underbuilt on the towers at this location would not be distinguishable from the transmission conductor due to distance and the fact that the telecommunications line would be smaller than the transmission conductor it would be attached to. Overall, the general visual character of the view would not change, as the appearance of electrical infrastructure within an urban environment would continue to dominate the view. Therefore, from this view location, the change in visual character and quality resulting from implementation of the proposed project is less than significant under this criterion."
					Under the heading <b>Figure 4.1-11, Viewpoint 10</b> , the text does not address all project components that may be visible in the view. Additional project components should be described. O2-94
					Under the discussion for <b>Figure 4.1-9, Viewpoint 7</b> , the Viewpoint numbering is inaccurate and should be revised. O2-93

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81	Agricultural and Forestry 4.2	4.2-2	10	"Under the A-2 district, "electric distribution substations, electric transmission substations and generating plants" are considered permitted uses, provided a conditional use permit has been obtained."	Revise as follows: "Under the A-2 district, "electric distribution substations, electric transmission substations and generating plants" are considered uses subject to permits (Section 22.24.150 LACo Code). <u>permitted</u> uses, provided a conditional use permit has been obtained"	Under the subsection 4.2.1 – Environmental Setting, there is a discussion about the Los Angeles County zoning designation (i.e., A-2 (Heavy Agriculture)) for the Aliso Canyon Storage Field and the permitted uses for this zoning. Further, the CPUC is vested with jurisdiction over the project. To this end, local agencies are pre-empted from exercising discretionary land use permitting authority over the Proposed Project. Such permits contravene the authority that has been placed in the CPUC's hands pursuant to Article XII of the California Constitution. Further, such permits could have the effect of potentially modifying or precluding construction of the proposed project after it has been approved by the CPUC.
82	Agricultural and Forestry 4.2	4.2-5	10-11	"The proposed project would temporarily disturb up to 174.66 acres of land zoned Agriculture and up to 50.18 acres of land zoned Open Space in Los Angeles and Ventura counties; however, the proposed project components would not disturb land used for active agricultural purposes. Further, land would revert back to previous use after construction. In addition, the proposed project does not traverse land zoned as forest land or timberland. Therefore, this impact would be less than significant without mitigation under this criterion."	Revise as follows: "The proposed project would temporarily disturb up to 174.66 acres of land zoned Agriculture and up to 50.18 acres of land zoned Open Space in Los Angeles and Ventura counties; however, the proposed project components would not disturb land used for active agricultural purposes. Further, land would revert back to previous use after construction. In addition, the proposed project does not traverse land zoned as forest land or timberland. Therefore, there would be no impact under this criterion <del>this impact would be less than significant without mitigation under this criterion.</del> "	Under the heading Impact AG-2, Conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use, the estimates of disturbed acres are not supported. There is no justification for the estimate of 174.66 acres of temporary disturbance to land zones agriculture and 50.18 acres of land zones open space. The acreages presented should be deleted.
83	Air Quality 4.3	4.3-6			Revise regulatory setting section per comments provided	Under the heading 4.3.2.3 Regional and Local, the section does not describe Ventura County Air Pollution Control District or the applicable

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					thresholds for NOx and VOC. Text should be added to reflect the 3.5 miles of Telecom Route 2 that would result in activities within the VCAPCD. Cont.
84	Air Quality 4.3.4	4.3-9	8-9	"The applicant proposes to pave all access roads within the construction zones; thus, unpaved road fugitive dust emissions would not be generated during construction."	Revise as follows: "The applicant proposes to pave all access roads within the construction zones; thus, unpaved road fugitive dust emissions would not be generated during construction."
85	Air Quality 4.3.4	4.3-11	Table 4.3-6		Make the correction in Table 4.3-6
86	Air Quality 4.3.4.2	4.3-13	9-16	"MM AQ-1: Oxides of Nitrogen (NOx) Credits. The emissions of NOx due to construction of the proposed project will be mitigated through the purchase of Regional Clean Air Incentive Market Trading Credits (RTCs) for every pound of NOx emissions in excess of the SCAQMD daily significance threshold of 100 pounds per day. The total amount of NOx RTCs to be purchased will be calculated when the construction schedule and operating conditions are finalized. The applicant will purchase and submit the required RTCs to the SCAQMD prior to the start of project construction. The applicant will also track actual daily emissions during construction according to a monitoring plan that includes records of equipment and vehicle usage."	In Table ES-1, MM AQ-1 should be revised as described in the accompanying cover letter: MSERCs are more appropriate because construction emissions will primarily be generated from mobile sources such as trucks, cranes and other on-road and off-road vehicles. Furthermore, SCAQMD and CARB have stated that the acquisition of MSERCs is an appropriate way to mitigate mobile source emissions (SCAQMD Regulation XVI and Rule 2202). These credits are created by purchasing and deploying lower-emitting vehicles, thereby reducing mobile source emissions. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter

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87	Air Quality 4.3.4.2	4.3-15	9	"however, emissions at this level would not likely cause a perceptible odor to a substantial number of people due to the distance between paving activities and the nearest sensitive receiver."	Revise as follows: "however, emissions at this level would not likely cause a perceptible odor to a substantial number of people due to the distance between paving activities and the nearest sensitive receiver."	Under the heading <b>Impact AQ-5</b> , sensitive receptors are referred to as "sensitive receivers"; this should be corrected for clarification. O2-101
88	Biological Resources 4.4.1.2	4.4-5	41	"This community occurs within the 66-kV subtransmission line and storage field portions of the proposed project site."	Revise as follows: "This community occurs within the 66-kV subtransmission line and storage field portions of the proposed project site."	Under the heading <b>Southern Willow Scrub</b> , the section describes that the Southern Willow Scrub plant community is present within the SCG storage field portion of the proposed project site. However, this community was not mapped within the storage field during the PEA evaluation or DEIR evaluation. O2-102
89	Biological Resources 4.4.1.2	4.4-7	3-4	"...no perennial waters occur in the immediate project area."	Revise as follows: "...no perennial waters occur in the immediate project area. However, there are two existing detention basins in Limekiln Creek, located west of the Central Compressor Station site, which are small perennial water bodies."	Under the heading <b>Streams and Riparian Areas</b> , the text inaccurately describes the presence of riparian areas in Limekiln Creek. The text should be revised for accuracy. O2-103
90	Biological Resources	4.4-7	21-23	"Surveyors observed one occupied red-tailed hawk ( <i>Buteo jamaicensis</i> ) nest in the lattice of structure, 18 during the habitat assessment in 2009, and one unoccupied nest in the proposed project area. Regionally abundant birds that may nest in these stick nests would be protected under the Migratory Bird Treaty Act (MBTA)."	Revise as follows: "Surveyors observed one occupied red-tailed hawk ( <i>Buteo jamaicensis</i> ) nest in the lattice of structure, 18 during the habitat assessment in 2009, and one unoccupied nest in the proposed project area. Most nesting birds are protected under the Migratory Bird Treaty Act (MBTA)."	Under the heading <b>4.4.1.3 Common Wildlife</b> , the comma after "structure", before "18", is confusing. Remove the comma for clarification. O2-104
91	Biological Resources 4.4.1.4	4.4-11	Table 4.4-3	"Likely present in the project component areas. Closest CNDDB..."	Revise as follows: "Likely/Unlikely. Suitable habitat present in the project component areas for this species does not exist within the proposed project site. Closest	Under the heading <b>Species</b> , in the Potential to Occur in Project Area column for <b>California Orcutt grass</b> , the text indicates the species is "likely" to occur in the project component areas. However, O2-105

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					CNDDB...	this species almost always occurs in vernal pools and seasonal wetlands, which are absent from project areas. Therefore, suitable habitat for this species does not exist within the proposed project site. O2-105 Cont.
92	Biological Resources 4.4.4.4	4.4-41	13-16	"Prior to construction of the proposed project, and with the coordination and review of USFWS and CDFG, SCE will prepare a habitat restoration plan for Venturan Coastal Sage Scrub associations for the 66-KV subtransmission line, Telecommunications Route #2, and proposed Natural Substation project areas."	Revise as follows: "Prior to construction of the proposed project, and with the coordination and review of USFWS and CDFG, SCE will prepare a habitat restoration plan for Venturan Coastal Sage Scrub associations for the 66-KV subtransmission line, Telecommunications Route #2, and proposed Natural Substation project areas."	Under the heading <b>MM BR-3: Habitat Restoration Plan for Venturan Coastal Sage Scrub</b> , only USFWS review is needed because Gnatcatcher is not a state listed species. O2-106 Also, see revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter.
93	4.4-11 to 4.4-16	4.4-16	Table 4.4-3		Revise as follows: "Definitions Unlikely = Species has been identified in the CNDDB records, but either the recorded observations are extremely old, key habitat requirements are absent, or the habitat in the proposed project study area is so degraded, small, or isolated that it would be very unlikely for the species to utilize the area. Likely = Species is known to occur within 5 miles of the proposed project study area (based on CNDDB records and/or professional expertise specific to the proposed project study area or species) and there is ideal habitat within the proposed project study area."	In <b>Table 4.4-3 Special Status Plants</b> , the "potential to occur" determinations often appear arbitrary and therefore the terms "likely" and "unlikely" should be defined and the criteria for selecting each term should be identified. This is a <b>GLOBAL COMMENT</b> O2-107
94	Biological Resources 4.4.1.4	4.4-17	40-41	"The coast horned lizard ( <i>Phrynosoma coronatum blainvillii</i> ; SSC) was incidentally observed in the project area during coastal California gnatcatcher surveys (Appendix	Revise as follows: "The coast horned lizard ( <i>Phrynosoma coronatum blainvillii</i> ; SSC) was incidentally observed in the project area during coastal California gnatcatcher surveys (Appendix	Under the heading <b>Coast horned lizard</b> , the text describes observation occurrence of the coast horned lizard during gnatcatcher surveys. However, an additional observation occurred during O2-108

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				E-1)." "	surveys and reconnaissance-level habitat surveys (Appendix E-1)." "
95	Biological Resources 4.4.1.4	4.4-18	Table 4.4-4	"Unlikely. No suitable..."	Revise as follows: "Unlikely Absent. No suitable..."
96	Biological Resources 4.4.1.4	4.4-19	Table 4.4-4	"Likely. Known to occur in Los Angeles..."	Revise as follows: "Likely Unlikely. Known to occur in Los Angeles..."
97	Biological Resources 4.4.1.4	4.4-20	Table 4.4-4	"Least Bell's vireo Likely. Closest CNDDB occurrence 5 miles northwest of 66-KV subtransmission line structure 1 in 1988, and 4 miles southeast of San Fernando Substation in 2003. Suitable habitat present throughout project component areas. Project component areas lie within known breeding range for this species."	Revise as follows: "Least Bell's vireo Likely. Unlikely. Closest CNDDB occurrence 5 miles northwest of 66-KV subtransmission line structure 1 in 1988, and 4 miles southeast of San Fernando Substation in 2003. Only patches of marginal suitable habitat present throughout project component areas. Project component areas lie within known breeding range for this species."
98	Biological Resources	4.4-20	Table 4.4-4	"Southwestern willow flycatcher Likely. No CNDDB occurrences recorded"	Revise as follows:

Comment

O2-108 Cont.

reconnaissance-level habitat surveys and therefore should be stated in this section.

In Table 4.4-4, under the column heading **Potential to Occur** for the Sierra Madre yellow legged frog, the status should be changed from "Unlikely" to "Absent" to reflect the absence of suitable habitat within the project area. Neither the habitat nor the elevation is suitable for the species.

O2-109

In Table 4.4-4, under the column heading **Potential to Occur** for the California Condor (*Gymnogyps californianus*), the status should be changed from "Likely" to "Unlikely" to reflect the habitat within the project area. The California Condor is a highly endangered species typically found to the north-northeast in remote habitats. There are limited large mammals for a carcass base within the project area and limited foraging habitat. In addition, all birds within the wild population are monitored on a daily basis and can have predictable movement patterns in the breeding and post breeding season.

O2-110

In Table 4.4-4, the determination for Least Bell's vireo should be changed from "likely" to "unlikely"; the riparian habitat within the project area is not suitable for LBV breeding, as supported in Exhibit A-2 of the accompanying Cover Letter.

O2-111

In Table 4.4-4, the determination for SWWVF should be changed from "Likely" to "Absent. The riparian

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	4.4.1.4			within 10 miles of the project component areas. Suitable habitat present. Known or believed to occur in Los Angeles and Ventura Counties (USFWS 2010a; DOI 2011)."	"Southwestern willow flycatcher <u>Likely Absent</u> . No CNDDB occurrences recorded within 10 miles of the project component areas. Suitable habitat is not present. Known or believed to occur in Los Angeles and Ventura Counties (USFWS 2010a; DOI 2011)."
99	Biological Resources 4.4.1.4	4.4-25	39-41	"Negative survey results for coastal California gnatcatchers in the proposed project area are likely due to the fact that the coastal sage scrub is of marginal quality and fragmented, as well as the steepness of slopes within the proposed project site."	Revise as follows: "Negative survey results for coastal California gnatcatchers in the proposed project area are likely due to the fact that the coastal sage scrub is of marginal quality and fragmented, as well as the steepness of slopes within the proposed project site."
100	Biological Resources 4.4.2.4	4.4-35	45		Under the heading <b>Coastal California gnatcatcher</b> , the presence determination statement contradicts the "Likely" determination in Table 4.4-4. Recommend deleting text for clarification.
101	Biological Resources 4.4.4.4	4.4-40	29-35	"MM BR-1: Trimming of Vegetation. In order to minimize the removal of vegetation in areas of habitat for the coastal California gnatcatcher, for the 66-kV subtransmission line, Telecommunications Route #2, and proposed Natural Substation project areas, SCE will ensure that trimming of all native vegetation, riparian vegetation, and vegetation that provides potential habitat for coastal California gnatcatcher will be performed by a certified arborist or a person with a minimum of 6 years' regional expertise in trimming trees/shrubs in this area and who has worked under a certified	Under the heading <b>MM BR-1: Trimming of Vegetation</b> , monitoring of all vegetation trimming by a certified arborist is not justified. An arborist specializes in the care of trees and woody shrubs, but most of the vegetation in the project area consists of grasses and scrub species, including gnatcatcher habitat, which should be monitored by a biologist. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter.
					Under the heading <b>4.4.2.4 Regional and Local</b> , a description of the Ventura County Oak Tree Ordinance is missing. Include a summary and revise accordingly.



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				arborist."	years' regional expertise in trimming trees/shrubs in this area and who has worked under a certified arborist.
102	Biological Resources 4.4.4.4	4.4-41	13-32	"MM BR-3: Habitat Restoration Plan for Venturan Coastal Sage Scrub. Prior to construction of the proposed project, and with the coordination and review of USFWS and CDFG, SCE will prepare a habitat restoration plan for Venturan Coastal Sage Scrub associations for the 66-kV subtransmission line, Telecommunications Route #2, and proposed project areas.... 3. Purchase of credits and/or mitigation lands at a ratio above 0.5:1 from an entity reviewed and approved by the USFWS and/or CDFG. Details of the restoration plan will be finalized pending consultation between SCE, USFWS, and CDFG...."	Revise as follows: "MM BR-3: Habitat Restoration Plan for Venturan Coastal Sage Scrub. Prior to construction of the proposed project, and with the coordination and review of USFWS and CDFG, the applicant and SCE will prepare a habitat restoration plan for Venturan Coastal Sage Scrub associations for the 66-kV subtransmission line, Telecommunications Route #2, and proposed Natural Substation project areas.... 3. Purchase of credits and/or mitigation lands at a ratio above 0.5:1 from an entity reviewed and approved by the USFWS and/or CDFG. Details of the restoration plan will be finalized pending consultation between the applicant, SCE, and USFWS, and CDFG...."
					Under the heading <b>MM BR-3: Habitat Restoration Plan for Venturan Coastal Sage Scrub</b> , the text describes CDFG oversight; however, CDFG oversight is not warranted due to the fact that the gnatcatcher is not a state-listed species. The project proponent should provide oversight over development of the restoration plan in addition to SCE. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter.
103	Biological Resources 4.4.4.4	4.4-46	11-24	"MM BR-8: Pre-Construction Surveys for Least Bell's Vireo and Southwestern Willow Flycatcher. Prior to construction, the applicant and SCE will complete protocol-level surveys for least Bell's vireo and southwestern willow flycatcher in areas of suitable or potentially suitable habitat in the proposed project component areas. Surveys will be completed by a permitted biologist(s) according to the survey protocol for least Bell's vireo (USFWS 2001) and southwestern willow flycatcher (Sogge et al., 2010). Whenever least	Under the heading <b>MM BR-8: Pre-Construction Surveys for Least Bell's Vireo and Southwestern Willow Flycatcher</b> , the mitigation measure should be revised with removal of reference to SWWF. The riparian habitat within the project area is not suitable for SWWF. SWWF requires wide willow riparian forest corridors with areas of standing water under the forest canopy. This type of habitat is not present in the project area, as supported in Exhibit A-2 of the accompanying Cover Letter. See Exhibit A-1 of the accompanying Cover Letter for supporting revisions.

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104	Cultural Resources, 4.5	4.5-17	36-43	2010). Whenever least Bell's vireo or southwestern willow flycatcher territory or nest sites are confirmed, the applicant and/or SCE will notify the USFWS and CDFG immediately upon return from the field. In the event that any least Bell's vireos or southwestern willow flycatchers or their nests are observed, biologists will establish and maintain a minimum 500-foot exclusionary buffer by installing temporary flagging or fencing between the nest site and construction activities. <del>Federal endangered species recovery permits are not required for least Bell's vireo surveys but are required in all USFWS regions where the southwestern willow flycatcher breeds</del> (application forms can be downloaded at <a href="http://www.fws.gov/forms/3-200-55.pdf">http://www.fws.gov/forms/3-200-55.pdf</a> ). State survey permits also may be required from the CDFG for both species."	Bell's vireo or southwestern willow flycatcher territory or nest sites are confirmed, the applicant and/or SCE will notify the USFWS and CDFG immediately upon return from the field. In the event that any least Bell's vireos or southwestern willow flycatchers or their nests are observed, biologists will establish and maintain a minimum 500-foot exclusionary buffer by installing temporary flagging or fencing between the nest site and construction activities. <del>Federal endangered species recovery permits are not required for least Bell's vireo surveys but are required in all USFWS regions where the southwestern willow flycatcher breeds</del> (application forms can be downloaded at <a href="http://www.fws.gov/forms/3-200-55.pdf">http://www.fws.gov/forms/3-200-55.pdf</a> ). State survey permits also may be required from the CDFG for both species."
				Under the heading <b>MM CR-4: Stop Work for Unanticipated Cultural Resources Discoveries</b> , provide clarification that CPUC approval does not require commissioner approval for the archeological contractor.  See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter.	O2-117 Cont.

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105	Cultural Resources, 4.5	4.5-5	12	"historic properties"	Revise as follows: "historic <u>properties</u> resources"	Under the heading <b>66-kV Subtransmission Line Segments D and E and Telecommunications Route #3</b> , the term "historic properties" is presented; however this term is federal terminology; this project has no federal nexus. Therefore, the term "historic resources" should be used as it is a CEQA term and is more appropriate. O2-119
106	Cultural Resources, 4.5	4.5-5	29	"The Area of Potential Effect (APE) for 66-kV Subtransmission Line Segments A, B, C, D, and E and Telecommunications Route #1 was defined as a 30-meter radius around each existing tower or structure. Archaeological surveys of the APE were conducted on April 23 and 26, 2009....  Each tower area and access road was subjected to intensive pedestrian-level surveys with transect widths no more than 10 meters apart to ensure that all surface-exposed artifacts and sites within the APE would be identified. Ground visibility varied from excellent in areas recently affected by fire, to poor in most cases where vegetation or ground cover was dense. The area around most of the towers has been previously disturbed. No archaeological materials were observed or collected in the APE (SoCalGas 2011)."	Revise as follows: - <del>"The Area of Potential Effect (APE)-The protected area for 66-kV Subtransmission Line Segments A, B, C, D, and E and Telecommunications Route #1 was defined as a 30-meter radius around each existing tower or structure. Archaeological surveys of the APE were conducted on April 23 and 26, 2009...."</del> Each tower area and access road was subjected to intensive pedestrian-level surveys with transect widths no more than 10 meters apart to ensure that all surface-exposed artifacts and sites within the APE <u>project area</u> would be identified. Ground visibility varied from excellent in areas recently affected by fire, to poor in most cases where vegetation or ground cover was dense. The area around most of the towers has been previously disturbed. No archaeological materials were observed or collected in the <u>APE project area</u> (SoCalGas 2011)."	Under the heading <b>Field Surveys</b> , the term "APE" is presented; however this term is federal terminology; this project has no federal nexus. CEQA has no analogous term and refers to general project impacts but not in a spatial context. <i>Project area</i> is a typical term used in CEQA documents. O2-120
107	Cultural Resources, 4.5	4.5-6	3	"A letter requesting a search of the Sacred Lands Files at the Native American Heritage Commission (NAHC) was sent on June 22, 2011. No response has yet been received."	Revise as follows: - <del>"A letter requesting a search of the Sacred Lands Files at the Native American Heritage Commission (NAHC) was sent on June 22, 2011. No response has yet been received."</del>	Under the heading, <b>Native American Consultation</b> , the text describes that the NAHC has not yet responded to the letter request for Sacred Lands Files. However, the NAHC responded on O2-121

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				received. Along with the results of the search, the NAHC will provide a list of Native American tribes and contacts who have expressed an interest in the proposed project component areas. Letters will be sent to the contacts provided to give an opportunity for the Native American community to express concerns about the proposed project."	has yet been received. The NAHC responded to the NOP on October 26, 2010. The response included results of the Sacred Lands File Search, which did not identify any resources within the project area. However, there are resources in close proximity. Along with the results of the search, the NAHC will provide a list of Native American tribes and contacts who have expressed an interest in the proposed project component areas. Letters will be sent to the contacts provided to give an opportunity for the Native American community to express concerns about the proposed project.
108	Cultural Resources, 4.5	4.5-9	37	"5097.98 (b) and (e)"	Revise as follows: "5097.98 (b) (a) and (e) (b)"
109	Cultural Resources, 4.5	4.5-16	2	"Construction activities could impact known and unknown historical resources. Data collected from the records search and surveys revealed that historical resources have been documented within the proposed project component areas (see discussion below). Further, cultural resources surveys have not been conducted for some areas of the proposed project, and it is possible that previously unrecorded historical resources are present."	Under the heading of Impact Analysis, Impact CR-1, the following CEQA (Appendix G) checklist question regarding - Substantial adverse change in the significance of an historical resource has been included in the analysis.  No historical resources have been identified in the proposed project area. Although inventory and evaluation has not been completed, based on the types of resources identified to date, this approach should mitigate impacts to a level less than significant. The impacts related to construction and operation of project components implemented by both the applicant and SCE have been adequately

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110	Cultural Resources, 4.5	4.5-16	37	"Prior to issuance of construction permits, the applicant and SCE will submit Cultural Resources Plans for the respective project components, prepared by the approved consultant(s) for review and approval by the CPUC. The intent of the Cultural Resources Plans will be to address cultural resources eligible for the CRHR that cannot be preserved by avoidance and to identify areas where monitoring of earth-disturbing activities is required."	Revise as follows: "Prior to issuance of construction permits, the applicant and SCE will submit <u>Archaeological Monitoring and Treatment Cultural Resources Plans</u> for the respective project components, prepared by the approved <u>consultant(s)</u> contractor for review and approval by the CPUC staff. The intent of the <u>Cultural Resources Plans</u> will be to address cultural resources eligible for the CRHR that cannot be preserved by avoidance and to identify areas where monitoring of earth-disturbing activities is required."	evaluated. O2-123 Cont.  Under the heading, <b>MM CR-1: Cultural Resources Plan</b> , clarification should be presented as to which Cultural Resources Plans will be required – Under MM CR-6 a Paleontological Monitoring and Treatment Plan is explicitly called for. O2-124 See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter.
111	Cultural Resources, 4.5	4.5-17	17	" <b>MM CR-2: Additional Cultural Resources Surveys.</b> Prior to issuance of construction permits, the applicant and SCE will ensure that qualified archaeological, as specified in the Cultural Resources Plans, will conduct intensive-level cultural resources surveys (transects no greater than 15 meters) for all areas to be disturbed that have not already been surveyed for cultural resources and, prior to the project, had previously been undisturbed."	Revise as follows: " <b>MM CR-2: Additional Cultural Resources Surveys.</b> Prior to issuance of construction permits, the applicant and SCE will <del>ensure that</del> retain qualified archaeological <del>consultant(s)</del> contractor(s), as specified in the <u>Cultural Resources Plans</u> , to conduct intensive-level cultural resources surveys (transects no greater than 15 meters) for all areas to be disturbed that have not already been surveyed for cultural resources and, prior to the project, had previously been undisturbed."	Under the heading <b>MM CR-2: Additional Cultural Resources Surveys</b> , the use of "ensure" appears excessive and should be revised for clarification. O2-125 See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter.
112	Cultural Resources, 4.5	4.5-17	36	"If the resource is significant but cannot be avoided and may be subject to further impact, the CPUC-approved archaeological monitor would evaluate the significance of the resource based on eligibility for the California Register of	Revise as follows: "If the resource is significant but cannot be avoided and may be subject to further impact, the CPUC-staff approved archaeological <del>monitor</del> would evaluate the significance of the resource based on eligibility for the California Register of Historical	Under the heading <b>MM CR-4: Stop Work for Unanticipated Cultural Resources Discoveries</b> , typically monitors do not evaluate the significance of a site and the protocol for evaluation will be established in the plans specified in MM CR-1. Clarifying text should be added to the measure. O2-126

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				Historical Resources (CRHR) or local registers and implement appropriate measures in accordance with the Archaeological Monitoring and Treatment Resources Plans."	Resources (CRHR) or local registers and implement appropriate measures in accordance with the Archaeological Monitoring and Treatment Resources Plans."	See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter. O2-126 Cont.
113	Cultural Resources, 4.5	4.5-17	3	"MM CR-5: Cultural Resources Reporting. Prior to final inspection after construction of project components has been completed, the applicant's and SCE's qualified archaeologists as specified in the Cultural Resources Plans will submit reports to the CPUC summarizing all monitoring and mitigation activities and confirming that all mitigation measures have been implemented."	Revise as follows: "MM CR-5: Cultural Resources Reporting. Prior to final inspection after construction of project components has been completed, the applicant's and SCE's qualified archaeologists as specified in the <del>Cultural Resources</del> Archaeological Monitoring and Treatment Plans will submit reports to the CPUC summarizing all monitoring and mitigation activities and confirming that all mitigation measures have been implemented."	Under the heading, <b>MM CR-5: Cultural Resources Reporting</b> , type of plan needs clarification. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter. O2-127
114	Cultural Resources, 4.5	4.5-21	10	"Implementation of MM CR-6, MM CR-7, MM CR-8, MM CR-9, and MM CR-10, which include the development of Paleontological Monitoring and Treatment Plans, paleontology construction monitoring, data recovery procedures, construction personnel training, and stop work procedures for unanticipated discoveries would reduce impacts on paleontological resources to less than significant."	Revise as follows: "Implementation of MM CR-6, MM CR-7, MM CR-8, MM CR-9, and <del>AMP</del> <del>MM CR-10</del> , which include the development of Paleontological Monitoring and Treatment Plans, paleontology construction monitoring, data recovery procedures, construction personnel training, and stop work procedures for unanticipated discoveries would reduce impacts on paleontological resources to less than significant."	Under the heading of <b>Impact Analysis, Impact CR-3</b> the following CEQA checklist (Appendix G) question - Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature and been included in the analysis. O2-128  The impacts related to construction and operation of project components implemented by both the applicant and SCE have been adequately evaluated. Recommend replacing MM CR-7 with MM HZ-6 and renumbering the remaining MM CRs.
115	Cultural Resources, 4.5	4.5-22	4	"MM CR-7: Construction Personnel Training. Prior to 1 the initiation of construction or ground disturbing activities in areas with high paleontological sensitivity, the applicant...."	Revise as follows: "MM CR-7: Construction Personnel Training. Prior to 1 the initiation of construction or ground disturbing activities in areas with high paleontological sensitivity, the applicant...." <del>APM</del>	Under the heading, <b>MM CR-7: Construction Personnel Training</b> , MM CR-7 is redundant with HZ-6. Recommend deleting MM CR-7 and replacing it with O2-129



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					<b>HZ-6: Worker Environmental Awareness Training.</b> Prior to construction, the applicant and SCE will develop and implement Worker Environmental Awareness Training Programs based on the following:	APM HZ-6: Worker Environmental Awareness Training. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter.
116	Cultural Resources, 4.5	4.5-22	12	"MM CR-8: Paleontology Construction Monitoring. Based on the Paleontological Monitoring and Treatment Plans, the applicant and SCE will conduct paleontological monitoring using CPUC approved paleontological monitors. This will include monitoring during rough grading and trenching in areas determined to have high paleontological sensitivity and that have the potential to be shallow enough to be adversely affected by such earthwork as determined by the CPUC-approved paleontological monitors."	Revise as follows: <b>MM CR-8: Paleontology Construction Monitoring.</b> Based on the Paleontological Monitoring and Treatment Plans, the applicant and SCE will conduct paleontological monitoring using CPUC staff approved paleontological monitors. This will include monitoring during rough grading and trenching in areas determined to have high paleontological sensitivity and that have the potential to be shallow enough to be adversely affected by such earthwork as determined by the CPUC-staff approved paleontological monitors. Paleontological Monitoring and Treatment Plans.	Under the heading, <b>MM CR-8: Paleontology Construction Monitoring</b> , the decision regarding monitoring area needs to be clarified.  MM CR-8 needs to be renumbered to MM CR-7 based on the replacement of previous MM CR-7 with HZ-6. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter.
117	Cultural Resources, 4.5	4.5-22	18	"MM CR-9: Stop Work for Unanticipated Paleontological Discoveries. If the resource is significant but cannot be avoided and may be subject to further impact, the CPUC-approved paleontological would evaluate the significance of the resource and implement appropriate measures in accordance with the Paleontological Monitoring and Treatment Plans."	Revise as follows: <b>MM CR-9: Stop Work for Unanticipated Paleontological Discoveries.</b> If the resource is significant but cannot be avoided and may be subject to further impact, the CPUC-approved paleontological monitor would evaluate the significance of the resource and implement appropriate measures in accordance with the Paleontological Monitoring and Treatment Plans.	Under the heading <b>MM CR-9: Stop Work for Unanticipated Paleontological Discoveries</b> , Typically monitors do not evaluate the significance of a resource and the protocol for evaluation will be established in the plans specified in MM CR-6. MM needs to be renumbered to CR-8 based on the replacement of previous MM CR-7 with HZ-6. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter.
118	Cultural Resources, 4.5	4.5-22	28-32	"MM CR-10: Paleontological Data Recovery"	Revise as follows: <b>MM CR-409: Paleontological Data Recovery</b>	Under the heading <b>MM CR-10: Paleontological Data Recovery</b> , MM needs to be renumbered to CR-9 based on the replacement of previous MM

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					CR-7 with HZ-6. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter.
119	Geology, Soils and Minerals 4.6	4.6-15	7 through 12	<p><b>*Subsidence</b> The proposed project component areas are located within an area of known subsidence associated with fluid withdrawal (ground water or petroleum), peat oxidation, or hydrocompaction. Subsidence would be primarily associated with the withdrawal of oil and gas from the sedimentary strata located within the storage field. However, although both groundwater and petroleum have been removed from the ground, there is no evidence that significant subsidence has occurred or may occur in the future. Based on the geologic structure and rock type comprising the storage field, subsidence related to the Proposed Project is considered to be remote. <del>In addition, likelihood of seismically induced settlement is therefore, considered to be remote.</del></p>	<p>Revise as follows:  <b>*Subsidence</b> The proposed project component areas are <del>not</del> located within an area of known subsidence associated with fluid withdrawal (ground water or petroleum), peat oxidation, or hydrocompaction. <del>Subsidence would be primarily associated with the withdrawal of oil and gas from the sedimentary strata located within the storage field. However, although both groundwater and petroleum have been removed from the ground, there is no evidence that significant subsidence has occurred or may occur in the future. Based on the geologic structure and rock type comprising the storage field, subsidence related to the Proposed Project is considered to be remote. <del>In addition, likelihood of seismically induced settlement is therefore, considered to be remote.</del></del></p>
120	Hazards and Hazardous Materials	4.8-8	29-32	<p>"Gas migration from an underground well to the surface can occur in three ways: (1) from defective cementing of new wells or abandoned wells, (2) through overpressurization of cracks or faults, and (3) through the formation of new fractures due to the natural gas injection and storage process."</p>	<p>Under the heading <b>Natural Gas and the Aliso Canyon Storage Reservoir</b>, the text inaccurately describes gas migration process through new fractures. However, new fractures cannot form unless the injection pressure is higher than the original naturally occurring pore pressure. In the case of Aliso Canyon, injection pressure does not exceed the original naturally occurring pore pressure at the time of discovery of the reservoir. Clarifying text should be provided.</p>



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					naturally occurring pore pressure at the time of discovery of the reservoir."	O2-134 Cont.
121	Hazards and Hazardous Materials	4.8-11	18-20	"A second safety incident occurred in January 1993, during the Northridge 6.7 magnitude earthquake in the region. Ground moving and shaking caused significant equipment damage and multiple pipeline ruptures, resulting in a shutdown of operations."	Revise as follows: "A second safety incident occurred in January 1993, during the Northridge 6.7 magnitude earthquake in the region. Ground moving and shaking caused significant minor equipment damage to pipelines at Aliso Canyon, and multiple pipeline ruptures, resulting in a temporary suspension of operations in order to thoroughly inspect the entire system before resuming operations."	Under the heading <b>Storage Field Safety Record</b> , the reference to the earthquake inaccurately describes the impact. The earthquake caused only minor equipment damage. Pipelines ruptured down in the valley, however no pipelines ruptured at the Aliso Canyon natural gas storage facility.
122	Hazards 4.8.3	4.8-39	39-41	"Impact HZ-6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. <i>LESS THAN SIGNIFICANT</i> "	Revise as follows: "Impact HZ-6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. <i>LESS THAN SIGNIFICANT</i> "	Under the heading, <b>Impact HZ-6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. LESS THAN SIGNIFICANT</b> , the significance determination should be revised consistent with the evaluation from "less than significant" to "no impact". This is a <b>GLOBAL COMMENT</b>
123	Hazards 4.8.3	4.8-23	1 <sup>st</sup> Row of Table 4.8-5	"Natural gas (within compressors and piping); lubricating oils (within equipment); and minor maintenance chemicals. Waste oil, gas stream condensates, oily debris, minor trash, and metal scrap."	Revise as follows: "Natural gas (within compressors and piping); lubricating oils (within equipment); and minor maintenance chemicals; Waste oil, gas stream condensates, oily debris; minor trash, and metal scrap.—Same as current use."	In Table 4.8-5, column <b>Hazardous Materials and Wastes Anticipated During Proposed Project Operation</b> , the text should indicate "same as current use."
124	Hazards 4.8.4	4.8-26	31-32	"Storage pipelines are also cleaned"	Revise as follows:	Under the heading <b>Southern California Gas Safety Procedures</b> , the text inaccurately describes

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				regularly prior to the start of the injection season."	"Storage pipelines are also cleaned regularly prior to the start of the injection season."	O2-139 Cont. cleaning of storage pipelines and should be deleted.
125	Hydrology and Water Quality 4.9.4	4.9-11	4-34	"For the SCE project elements, construction laydown areas may require some grading, and wire pull, splicing, and tensioning locations would generally be located on existing level areas and existing roads to minimize the need for grading and cleanup."	Revise as follows: "For the SCE project elements, construction laydown areas may require some grading, and wire pull, splicing, and tensioning locations would generally be located on existing level areas and existing roads to minimize the need for grading and cleanup. The installation of the Chatsworth Substation to the Natural Substation will not require any grading or site disturbance that could potentially impact hydrology or water quality and so is not discussed further in the regulatory section of the analysis."	O2-139 Under the heading, <b>Environmental Impacts and Mitigation Measures</b> , the introduction section does not discuss the activities that are proposed for the Telecommunications Route #2 from the Chatsworth Substation to the Natural Substation. A statement is recommended to establish that this portion of the project does not include activities that may impact hydrology or water quality and so is not discussed further. This extends to excluding Ventura County regulations from the regulatory setting.
126	Hydrology and Water Quality 4.9.4.1	4.9-12	25	"Geology, Soils, and Mineral Resources • APM GE-1: Geotechnical Studies. • APM GE-2: Seismic-resistant Design Measures."	Revise as follows: "Geology, Soils, and Mineral Resources • APM GE-1: Geotechnical Studies. • <del>APM GE-2: Seismic-resistant Design Measures.</del> "	O2-140 Under the heading, <b>Applicant Proposed Measures</b> , the Applicant Proposed Measure APM GE-2: <i>Seismic-resistant Design Measures</i> has been listed as a proposed measure for <i>Impact HY-1: Violate water quality standards or waste discharge requirements</i> . However, APM GE-2 is not directly related to the protection of water quality and should be deleted. This is a <b>GLOBAL COMMENT</b>
127	Hydrology and Water Quality 4.9.4.2	4.9-17	46-47	"Impact HY-10: Risk of loss, injury or death involving flooding. <i>LESS THAN SIGNIFICANT</i> "	Revise as follows: "Impact HY-10: Risk of loss, injury or death involving flooding. <del>LESS THAN SIGNIFICANT</del> <i>NO IMPACT</i> "	O2-141 Under the heading, <b>Impact HY-10: Risk of loss, injury or death involving flooding</b> , the significance determination should be revised consistent with the evaluation from "less than significant" to "no impact" Significance determinations are not clearly defined. This is a <b>GLOBAL COMMENT</b>

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128	Hydrology and Water Quality 4.9.4.2	4.9-18	4-5	"Accordingly-any potential impact would be less than significant."	Revise as follows:  "Accordingly, any potential impact would be less than significant if the proposed project would have no impact associated with exposing people or structures to a significant risk of loss, injury or death involving flooding."	Under the heading, <b>Impact HY-10: Risk of loss, injury or death involving flooding</b> , the evaluation correctly states that the smaller footprints of the TSPs "are less likely to result in an accumulation of debris due to a flood event. This evaluation should result in a conclusion of 'no impact' as the potential impact has been reduced from existing conditions."  O2-142
129	Hydrology and Water Quality 4.9.4.2	4.9-17	35-36, 39-42, 44	"A mudflow is a downhill movement of soft, wet earth and debris caused by a rapid and heavy accumulation of rain or snowmelt in areas subject to potential for landslides. As discussed in Section 4.6, "Geology, Soils, and Mineral Resources," the proposed project is located within areas with earthquake-induced landslide potential. The applicant would employ APM GE-1, which involves the completion of geotechnical studies, prior to construction of the proposed Natural Substation (geotechnical studies have been completed for the Central Compressor Station) and would employ measures recommended in the geotechnical studies during construction to address potential impacts related to geological instability. In addition, the applicant would employ APM GE-2, ensuring that the final design of the proposed project, (including the proposed 66 kV subtransmission line modifications), would incorporate seismic-resistant design measures and be geotechnically appropriate for the setting of proposed project. Project components would meet applicable state seismic safety standards, including special foundation design, additional bracing, and structure	Revise as follows:  "A mudflow is a downhill movement of soft, wet earth and debris caused by a rapid and heavy accumulation of rain or snowmelt in areas subject to potential for landslides. As discussed in Section 4.6, "Geology, Soils, and Mineral Resources," the proposed project is located within areas with earthquake-induced landslide potential. The applicant would employ APM GE-1, which involves the completion of geotechnical studies, prior to construction of the proposed Natural Substation (geotechnical studies have been completed for the Central Compressor Station) and would employ measures recommended in the geotechnical studies during construction to address potential impacts related to geological instability. In addition, the applicant would employ APM GE-2, ensuring that the final design of the proposed project, (including the proposed 66 kV subtransmission line modifications), would incorporate seismic-resistant design measures and be geotechnically appropriate for the setting of proposed project. Project components would meet applicable state seismic safety standards, including special foundation design, additional bracing, and structure	Under the heading, <b>Impact HY-8: Risk of loss, injury or death involving inundation by selche, tsunami, or mudflow</b> , the CEQA checklist (Appendix G) question has not been correctly analyzed.  The logic used to assess this potential impact for mudflows is incorrect. Earthquake induced landslide hazards and potential for mudflows are not directly related as implied in lines 35 and 36 on page 4.9-17. Section 4.6 states that "Portions of the proposed project traverse hills and slopes that may be susceptible to landslides both seismically and seismically induced. These landslides occur in areas with steep and unstable slopes; these types of slopes in the area could experience rapid earth movement in the form of a landslide with or without a seismic trigger." This statement is not relevant for mudflows.  It is recommended that the analysis should add the following sentence on line 44, before the last sentence of the section to correctly address mudflows. "Although the possibility of mudflows in construction areas is considered low."

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				appropriate for the setting of proposed project. Project components would meet applicable state seismic safety standards, including special foundation design, additional bracing, and structure support. Therefore, any potential impacts would be less than significant."	implementation of the SWPPP would further reduce the possibility of mudflows in these areas. However the Proposed Project would not alter the existing potential or baseline conditions related to mudflow hazards in the Project area. Therefore, potential impacts are less than significant. O2-143 Cont.
130	Hydrology and Water Quality 4.9.2.3	4.9-9 and 4.9-10	41, 45-46 (Pg. 4.9-9), 1 (Pg. 4.9-10)	"A grading permit is required by the LACDWP for the proposed projects that would result in the excavation or fill of more than 50 cubic yards of soil, per Title 26, Chapter 33, of the Los Angeles County Code. ... The LACDWP review process for the grading permit could require hydrologic evaluation and drainage designs (LACDWP 2009). ... If grading authorized by the permit is anticipated to extend into or through the rainy season (November 1 to April 15 of the following year), separate updated Erosion Control Plans must also be submitted to the LACDWP prior to October 1, per Section 3319.3 of the County of Los Angeles Building Code."	Under the heading, <b>Los Angeles County Department of Water and Power</b> , this section refers to the Los Angeles County Department of Water and Power (LACDWP) requiring a grading permit, performing a review process, and requiring an Erosion Control Plan. However, the correct name for the local agency is the Los Angeles County Department of Public Works (LACDPW) who will require this information. O2-144
131	Hazards 4.9.2.3	4.9-10	5	"LACDWP is updating its 2005 Urban Water Management Plan (UWMP), the preparation of which is required under the	Under the heading, <b>Los Angeles County Department of Water and Power</b> , line 5 refers to the Los Angeles County Department of Water and O2-145

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				California Urban Water Management Planning Act."	Water Management Plan (UWMP), the preparation of which is required under the California Urban Water Management Planning Act."
					Power (LACDWP) updating its 2005 Urban Water Management Plan (UWMP). However, the correct name of the municipal utility that supplies water to the project and is updating its UWMP is the Los Angeles Department of Water and Power (LADWP). O2-145 Cont.
132	Hazards 4.9 References	4.9-18	40	"LACDWP (Los Angeles County Department of Water and Power), 2009, Grading Review Sheet ..."	Under the heading, <b>References</b> , line 40 refers to Los Angeles County Department of Water and Power (LACDWP) Grading Review sheet. The correct name for the local agency is the Los Angeles County Department of Public Works (LACDPW) O2-146
133	Land Use 4.10	4.10-1 and 4.10-2	33-41	"Open Space Preserves, Parks, and Significant Ecological Areas Figure 4.10-1 shows open space areas, parks, and Significant Ecological Areas (SEAs) in the vicinity of the proposed project components. Portions of Segment C of the 66-kilovolt (kV) subtransmission line and Telecommunications Route #1 (Mile Post 5 to Mile Post 7) parallel the border between the City and County of Los Angeles. This border coincides with the boundary between Michael D. Antonovich Open Space and O'Melveny Park....."	Under the subheading <b>Open Space Preserves, Parks, and Significant Ecological Areas</b> , the text does not describe any open space preserves. A brief discussion should be added about applicable open space preserves in the text to be consistent with the subheading title. For example, the Michael D. Antonovich Open Space is an open space preserve that was dedicated in the Santa Clarita Woodlands Park by the Santa Monica Mountains Conservancy and the Mountains Recreation and Conservation Authority. O2-147

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					Post 7) parallel the border between the City and County of Los Angeles. This border coincides with the boundary between Michael D. Antonovich Open Space and O'Melveny Park. <u>The Michael D. Antonovich Open Space is an open space preserve that was dedicated in the Santa Clarita Woodlands Park by the Santa Monica Mountains Conservancy and the Mountains Recreation and Conservation Authority....</u>
					In addition, the term "Significant Ecological Areas" (SEAs) should be clearly defined. Also, it should be made clear where this definition is coming from (i.e., this designation derives from the Los Angeles County General Plan).
					Lastly, a brief discussion should be added about any open space areas, parks, and/or SEAs near or within Telecommunications Route #3 and Segments A, B, D, and E. Currently, the text describes the open space areas, parks, and SEAs near or within the storage field site, telecommunication routes #1 and #2, and Segment C. Even if there are no open space areas, parks, and/or SEAs near or within Telecommunications Route #3 and Segments A, B, D, and E, it should still be stated. By only describing certain portions of the proposed project, it suggests that only these portions of the proposed project were evaluated regarding these types of land uses.
134	Land Use 4.10	4.10-3	Figure 4.10-1		On <b>Figure 4.10-1</b> , no source information is provided to indicate where the information presented on this figure came from. A citation should be added to source the data used in this figure.
135	Land Use 4.10	4.10-6	28	"This area is both designated in the City's General Plan and zoned for Open Space. The storage field is located in an area designated as Rural in the Los Angeles County General Plan and zoned Heavy	Under subheading <b>Aliso Canyon Storage Field</b> , the text (starting on line 28) indicates that the County of Los Angeles General Plan land use designation for the storage field is Rural. This land

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				Agriculture (A-2). <sup>1</sup>	
136	Land Use 4.10	4.10-7	Figure 4.10-2		<p>Revise the figure as follows:</p> <ul style="list-style-type: none"> <li>• Add a citation(s) to source the data used in this figure.</li> <li>• Double-check the general plan land use designations for accuracy and revise, as needed. Make sure to discuss with your legal department the use of any general plan land use designations from draft plans, such as the Draft One Vision One Valley Land Use Map.</li> <li>• Add multiple legends to clearly depict the different jurisdiction's general plan land use designations. Consider following the format of Figure 4.9-1 of the ACTR PEA.</li> <li>• Add the missing general plan land use designations around portions of the Telecommunications Route #1 and 66-kV subtransmission line reconductoring route in the County of Los Angeles near the I-5 freeway and the SR-14 junction.</li> </ul>
					<p>use designation should be Non-Urban, not Rural. O2-149 The text should be revised accordingly.</p> <p>On Figure 4.10-2, no source information is provided to indicate where the information presented on this figure came from. A citation should be added to source the data used in this figure.</p> <p>In addition, this figure currently depicts a uniform general plan land use designation throughout the project area. The general plan land use designations should vary per jurisdiction, as each jurisdiction has their own general plan land use designation. For example, there should be a legend for each jurisdiction's general plan land use designation. Currently, there is one legend at the bottom and it is unclear what jurisdiction(s) this legend derives from. Figure 4.9-1 of the ACTR PEA provides a good example of illustrating multiple general plan land use designations in the project area.</p> <p>Furthermore, the general plan land use designations should be double-checked for accuracy. For example, most of the storage field site is shaded an olive green color, indicating that the general plan land use designation is Agriculture per the figure legend. However, according to the County of Los Angeles General Plan (adopted in 1980 and last amended in July 2005 (GPA03)), the County general plan land use designation for the storage field site is <u>Non-Urban</u>.</p>

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						Lastly, it appears there are parcels of land around the proposed project that do not show any general plan land use designations. Specifically, there are no general plan land use designations shown around portions of the Telecommunications Route #1 and 66-kV subtransmission line reconductoring route in the County of Los Angeles near the I-5 freeway and the SR-14 junction. This missing general plan land use designation data should be added to this figure. O2-150 Cont.
137	Land Use 4.10	4.10-11, 4.10-26 and 4.10-27		"County of Los Angeles, 2011, County of Los Angeles General Plan, Zoning Ordinance."	Check and revise all in-text citation and references section – see comments provided	(Comment continued)  For example, when the reader cross-references the "County of Los Angeles 2011" in-text citation with the references section at the end of Section 4.10, they are provided with the following full citation on p. 4.10-27:  O2-151  This one reference is referring to two different documents with two different adoption dates: The County of Los Angeles General Plan, and the County of Los Angeles Zoning Ordinance. The County of Los Angeles General Plan was adopted in 1980 and is currently being updated. A 2011 Draft General Plan Update was released to the public for comment in April 2011, but this is a working document and the Environmental Impact Report for the General Plan Update has not even been released yet. This draft document should not be used for this analysis. In addition, the County of Los Angeles Zoning Ordinance (Title 22) is a



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138	Land Use 4.10	4.10-20	5-32	<p><b>"Special Ecological Areas"</b> The county contains 60 SEAs. Areas designated as SEAs in the county have been identified as ecologically valuable for the perpetuation of plant and wildlife resources in the region. Some limited development is allowed within SEAs. For more information on SEAs and the SEATAC review process, see Section 4.4. "Biological Resources." Development within a designated SEA will be reviewed for compliance with the following criteria:.... If a project is located within the boundaries of an SEA, the Significant Ecological Areas Technical Advisory Committee (SEATAC) will review the project during the permitting process and make recommendations in order to reduce or avoid impacts (Los Angeles County 2009a)."</p>	<p>Revise as follows:  <b>"Special Significant Ecological Areas"</b> The county of Los Angeles contains 60 SEAs. Areas designated as SEAs in the county have been identified as ecologically valuable for the perpetuation of plant and wildlife resources in the region. Some limited development is allowed within SEAs. For more information on SEAs and the SEATAC review process, see Section 4.4. "Biological Resources." Development within a designated SEA will be reviewed for compliance by the Significant Ecological Areas Technical Advisory Committee (SEATAC) during the permitting process with the following criteria (Los Angeles County 2009a)."</p>
				<p>completely separate document from the County's General Plan and should be cited separately with the appropriate adoption date. It should also be made clear in these references whether or not these sources were print or electronic sources. If they were electronic sources obtained via a website, the website should be provided or there should be some indication that this is a web source.</p> <p>As a universal comment, the in-text citations throughout Section 4.10 and the references provided at the end of this section should be double-checked for accuracy and should be revised accordingly.</p>	<p>completely separate document from the County's General Plan and should be cited separately with the appropriate adoption date. It should also be made clear in these references whether or not these sources were print or electronic sources. If they were electronic sources obtained via a website, the website should be provided or there should be some indication that this is a web source.</p>
				<p>Under subheading <b>Special Ecological Areas</b>, the title of this subheading should be slightly revised (i.e., change "Special" to "Significant") for accuracy. In addition, the first sentence (on line 6) under this subheading refers to "the county." It is unclear what county this text is referring to and should be clarified, especially as the proposed project traverses through more than one county.</p> <p>Also, the acronym "SEATAC" should be spelled out the first time it is used (on line 8) for clarity. Currently, this acronym is used, and then spelled out later in this subsection (on line 30). In addition, this sentence on line 8 refers the reader to Section 4.4 of the DEIR for more information on the SEAs and SEATAC review process, but this is the first time this SEATAC review process is mentioned. We suggest making this sentence the last sentence</p>	<p>Under subheading <b>Special Ecological Areas</b>, the title of this subheading should be slightly revised (i.e., change "Special" to "Significant") for accuracy. In addition, the first sentence (on line 6) under this subheading refers to "the county." It is unclear what county this text is referring to and should be clarified, especially as the proposed project traverses through more than one county.</p> <p>Also, the acronym "SEATAC" should be spelled out the first time it is used (on line 8) for clarity. Currently, this acronym is used, and then spelled out later in this subsection (on line 30). In addition, this sentence on line 8 refers the reader to Section 4.4 of the DEIR for more information on the SEAs and SEATAC review process, but this is the first time this SEATAC review process is mentioned. We suggest making this sentence the last sentence</p>

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					of the subsection and incorporating the text starting on line 30 within the second paragraph for flow and clarity.
139	Land Use 4.10	4.10-26	13-24	<p>"Portions of the 66-kV subtransmission line route and Telecommunications Route #1, and Telecommunications Route #2 would pass through areas designated as SEAs by Los Angeles County, Los Angeles County. As discussed under Impact LU-2 and in Section 4.4, "Biological Resources," the proposed project would represent a reduction in land disturbance within the area of the SEA; thus, it is unlikely that the proposed project would conflict with the requirements of the county's SEA program. As stated in Section 4.4 Biological Resources, no HCPs or NCCPs have been adopted in the proposed project area; therefore, there would be no impacts and no mitigation would be required."</p>	<p>Under subheading Impact LU-3, the text needs to be revised to fully and accurately address the applicable CEQA threshold. Currently, the discussion is focused on the whether or not the proposed project conflicts with the County of Los Angeles' SEA program. The current discussion is equating the County's SEA program with a habitat conservation plan (HCP) or natural community conservation plan (NCCP), which is incorrect. SEAs are not HCPs or NCCPs and should not be discussed in this section. Only HCPs or NCCPs should be discussed in this section.</p> <p>If there are no HCPs or NCCPs in the project area, then this needs to be stated and the impact finding should be revised accordingly (i.e., change the finding from "less than significant" to "no impact"). The impact discussion also needs to be revised to show that the entire project is being evaluated, not just certain components. Currently, the discussion only mentions portions of the 66-kV subtransmission line route and Telecommunications Routes #1 and #2.</p> <p>Lastly, there should be a statement regarding mitigation measures (or lack thereof) associated with conflicting with any applicable HCP or NCCP.</p>
140	Noise 4.11.1	4.11-2	20-21	<p>"It is widely accepted that the average human ear can perceive changes of 3 dBA...."</p>	<p>Under the heading, <b>Noise and Vibration Fundamentals</b>, the statement "It is widely accepted that the average human ear can perceive changes of 3 dBA,..." is not accurate as it is widely accepted</p>

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						that a 3 dBA change is "barely perceptible" to the average human ear under normal conditions. O2-154 Cont.
141	Noise 4.11.4.2	4.11-18	Table 4.11-18	"83 dBA L <sub>eq</sub> " Exceeds Daytime Standard: "Yes"	Please revise as follows: "83 dBA 72 dBA L <sub>eq</sub> " Please revise as follows for all determination in the column Exceeds Daytime Standard: "Yes No"	In Table 4.11.18, in the column titled <b>Composite Noise Level at 50 feet (dBA, L<sub>max</sub>)</b> , the value presented is inaccurate. Construction noise attributed to installing the telecommunications line is 72 dBA L <sub>eq</sub> at 50 feet or 60 dBA L <sub>eq</sub> or less at distances of 150 feet or greater, a noise level below the city's standard for receptors. O2-155 In the column titled <b>Exceeds Daytime Standard</b> , please revise the determination to No, based on the updated noise levels presented above. Please see supporting analysis presented in Exhibit A-5 of the accompanying cover letter.
142	Noise 4.11.4.4	4.11-24	22	"SCE will prepare and implement a noise control plan to address all SCE structure installation/replacement and substation modifications associated with the SCE-proposed project components."	Revise as follows: "SCE will prepare and implement a noise control plan to address all SCE structure installation/replacement and substation modifications associated with the SCE-proposed project components."	Under the heading, <b>MM NS-1; Noise Reduction and Control Practices</b> , MM NS-1 is a redundant measure, as the project is already subject to a noise control plan (APM NS-2) that does not preclude the identified reconductoring or optic fiber line installation. Additionally, the noise control plan would include any and all measure as appropriate and would be able to be focused as once full knowledge of the activities thus the detailed requirements of MM NS-1 may be unnecessary. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter. O2-156
143	Noise 4.11.4.4	4.11-24; 4.11-25	46-47; 1-2	"Given the short duration of construction activity (less than a week) at any single location during reconductoring and fiber optic cable installation, this impact would be less than significant with the"	Revise as follows: "Given the short duration of construction activity (less than a week) at any single location during reconductoring and fiber optic cable installation, this impact would be less than significant with the"	Under the heading, <b>Construction Noise</b> , the statement incorrectly states that impacts would be lessened by the compliance with applicable plans and ordinances. However, the project's impacts are mitigated by the implementation of the NS APMs, O2-157

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				Implementation of mitigation after compliance with the proposed policies of applicable General Plan Noise Elements for all jurisdictions, and implementation of the APM NS-1, APM NS-2, and APM NS-3.	Implementation of mitigation after compliance with the proposed policies of applicable General Plan Noise Elements for all jurisdictions, and implementation of the APM NS-1, APM NS-2, and APM NS-3.
				which require compliance with local regulations.	
144	Noise 4.11.4.4	4.11-25	31	<p>"<b>MM NS-2: Operational Noise Control.</b> After construction of the Central Compressor Station is completed, the applicant will take measures as necessary to ensure that the operational noise levels from the Central Compressor Station do not exceed 45 dBA at the closest receptor in the City of Los Angeles. Measures that may be implemented to achieve this level during the operational phase for turbines, compressors, and cooling equipment proposed to be installed at the Central Compressor Station could include:</p> <ul style="list-style-type: none"> <li>• Turbines will be placed within an acoustical enclosure;</li> <li>• Compressor noise will be mitigated by placing an acoustical blanket over the compressor itself or enclosing the compressor within an appropriately rated acoustical building;</li> <li>• Noise emitted from gas process coolers will be mitigated by installing acoustic barriers without gaps around the equipment casing and with a continuous minimum surface density of 42 kilograms per square meter in order to minimize the transmission of sound."</li> </ul> <p>"In addition, implementation of MM NS-1 would mitigate the effects of a temporary</p>	<p>Under the heading, <b>MM NS-2: Operational Noise Control</b>, there does not seem to be an impact nexus for requiring MM NS-2. If the EIR preparer does not feel confident the analysis is accurate, which states there would not be any noise impact as the project is currently designed, then a more appropriate measure would be a noise survey after the project is built to verify compliance. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter.</p>
145	Noise	4.11-27	31	<p>Revise as follows:</p> <p>"<b>MM NS-2: Operational Noise Control.</b> After construction of the Central Compressor Station is completed, the applicant will take measures as necessary to ensure that the operational noise levels from the Central Compressor Station do not exceed 45 dBA at the closest receptor in the City of Los Angeles. Measures that may be implemented to achieve this level during the operational phase for turbines, compressors, and cooling equipment proposed to be installed at the Central Compressor Station could include:</p> <ul style="list-style-type: none"> <li>• Turbines will be placed within an acoustical enclosure;</li> <li>• Compressor noise will be mitigated by placing an acoustical blanket over the compressor itself or enclosing the compressor within an appropriately rated acoustical building;</li> <li>• Noise emitted from gas process coolers will be mitigated by installing acoustic barriers without gaps around the equipment casing and with a continuous minimum surface density of 42 kilograms per square meter in order to minimize the transmission of sound." <p>Revise as follows:</p> </li></ul>	<p>Under the heading, <b>Impact NS-4: Substantial temporary or periodic increase in ambient noise</b></p>

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146	Noise 4.11, 4.4	4.11-28	1	<p>Increase of ambient noise levels within the vicinity of the Plant Station site, Natural Substation, and reconductoring and fiber optic installation sites, resulting in a less than significant impact (after mitigation) related to construction noise under this criterion."</p> <p>"Operational noise from the proposed Central Compressor Station would produce a composite noise level of 75 dBA at the property line, which would, with the implementation of MM NS-2, attenuate over distance to less than 45 dBA at the closest sensitive receptors..." With the implementation of MM NS-2 during operation of the Central Compressor Station, it is anticipated that noise levels would not cause a substantial permanent increase over the existing ambient noise levels at the Plant Station site."</p>	<p>"In addition, implementation of <del>MM NS-4</del> APM NS-2 would <del>mitigate</del> reduce and control the effects of a temporary increase of ambient noise levels within the vicinity of the Plant Station site, Natural Substation, and reconductoring and fiber optic installation sites, resulting in a less than significant impact (after mitigation) related to construction noise under this criterion."</p> <p>Revise as follows: "Operational noise from the proposed Central Compressor Station would produce a composite noise level of 75 dBA at the property line, which would, with the implementation of APM NS-2 MM NS-2, attenuate over distance to less than <del>45</del> 23 dBA at the closest sensitive receptors..." With the applicant's implementation of <del>MM NS-2</del> APM NS-2 during operation of the Central Compressor Station, it is anticipated that noise levels would not cause a substantial permanent increase over the existing ambient noise levels at the Plant Station site."</p>
147	Recreation 4.14	4.14-5	11-13	"Impact RE-1: Result in substantial physical deterioration of parks and recreational facilities"	<p>Under the subheading <b>Impact RE-1</b>, the criteria should be fully restated to make it clear to the reader that the impact analysis is not simply looking to see if the project would result in substantial physical deterioration of parks and recreational facilities, but specifically seeing if the project would cause an increase in the use of existing parks or recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.</p>

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148	Recreation 4.14	4.14-5	23-28	<p>"Although project construction workers could increase the use of local recreational facilities, this use would be temporary."</p> <p>"There would be no long-term increase in the use of existing neighborhood and regional parks or other recreational facilities."</p>	<p>Revise as follows: "Although project construction workers could increase the use of local and regional parks and recreational facilities, this use would be temporary and minimal as the proposed project would only slightly increase the local construction workforce population if outside contractors were required. Furthermore, due to the large number of parks and recreational facilities located within two miles of the project site and the short project construction period of 22 months, it is anticipated that the temporary increase of the use of parks and recreational facilities during construction would not result in substantial or accelerated physical deterioration of these parks and recreational facilities."</p> <p>"There would be no long-term increase in the use of existing neighborhood and regional parks or other recreational facilities that would result in substantial physical deterioration of these facilities."</p>
149	Recreation 4.14	4.14-5	30	"A less than significant impact would result under this criterion."	Revise as follows: "A <del>less than significant</del> No impact would result under this criterion."
150	Chapter 5 Alternatives	5-5	6	"Regardless, during operations, emissions of NOx, carbon monoxide, and other pollutants under the Design Alternative would be higher than those from the proposed project."	Revise as follows: "Regardless, during operations, emissions of NOx, carbon monoxide, and other pollutants under the Design Alternative would be substantially higher than those from the proposed project."
					<p>Under subsection 4.14.4 – Environmental Impacts and Mitigation Measures, there is a discussion about the potential increased use of the parks and recreational facilities in the project area; however, there is no discussion about the potential physical deterioration of these parks and recreational facilities resulting from this increased use, per CEQA checklist (Appendix G). The text should be slightly revised to address this issue, thereby fully addressing this threshold.</p> <p>Under subsection 4.14.4 – Environmental Impacts and Mitigation Measures, correct to accurately reflect that no impact on Recreation would result from the proposed project.</p> <p>Under the heading Air Quality, onsite emissions generated from the design alternative would result in 100% greater emissions compared to the proposed project. Clarifying text should be included to reflect the significant decrease in emissions due</p>

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151	Chapter 5 Alternatives	5-5	39 and 40	"Although GHG emission under the Design Alternative would be less than significant, during operations they would be greater than for the proposed project."	Revise as follows: "Although GHG emission under the Design Alternative would be less than significant, during operations they would be substantially greater than for the proposed project."	to an electric-driven project. O2-164  Under the heading <b>Greenhouse Gases</b> , onsite emissions generated from the design alternative would result in 100% greater emissions compared to the proposed project. Clarifying text should be included to reflect the significant decrease in emissions due to an electric-driven project. O2-165
152	Chapter 5 Alternatives	5-5	48	"Up to 75 acres of critical habitat would be disturbed by construction of the new and modified electrical and telecommunications facilities for the proposed project."	Revise as follows: "Up to 75 acres of critical habitat would be disturbed by construction of the new and modified electrical and telecommunications facilities for the proposed project."	Under the heading <b>Coastal California Gnatcatcher</b> , the text inaccurately describes acreages of critical habitat that would be disturbed by the proposed project. The referenced 75 acres should be deleted and replaced with accurate disturbed acreage values presented in updated Table 2-7 (see Exhibit A-4 of the accompanying cover letter). O2-166
153	Chapter 5 Alternatives	5-7	38-46	"Fire hazards during construction activities would be reduced under the Design Alternative because the proposed electrical and telecommunications facilities would not be required. The storage field and proposed subtransmission line reconductoring and telecommunications line routes are located within a Very High Fire Hazard Severity Zone (Section 4.8, "Hazards and Hazardous Materials"). Implementation of the mitigation measures identified in this EIR for the proposed project, other than those specific to SCE, would ensure that impacts from increased risk of fire hazards during construction would be less than significant. The Design	Revise as follows: "Fire hazards during construction activities would be reduced under the Design Alternative because the proposed electrical and telecommunications facilities would not be required. The storage field and proposed subtransmission line reconductoring and telecommunications line routes are located within a Very High Fire Hazard Severity Zone (Section 4.8, "Hazards and Hazardous Materials"). However, the proposed project would reduce or avoid potential impacts associated with hazardous materials during operations because it eliminates use of SCR technology inherent with the use of gas powered turbines. Because of the long term reduction or avoidance of potential impacts from hazardous materials during operations, the	Under the heading <b>Hazards and Hazardous Materials</b> , additional information from the PEA should be presented for clarity, and conclusion corrected to correspond to additional text. See PEA Section 6.1.2 for discussion on SCR. O2-167

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				Alternative would be environmentally superior in comparison to the proposed project because impacts during construction of the proposed project from fire hazards would be avoided or reduced.	Proposed project is environmentally superior overall. Implementation of the mitigation measures identified in this EIR for the proposed project, other than those specific to SCE, would ensure that impacts from increased risk of fire hazards during construction would be less than significant. The Design Alternative would be environmentally superior in comparison to the proposed project because impacts during construction of the proposed project from fire hazards would be avoided or reduced.
154	Chapter 5 Alternatives	5-8	5-9	"The proposed 66-kV Subtransmission Line Segments A and B and Telecommunications Routes #1 and #3 would generate noise levels that could exceed applicable daytime allowable noise standards in the City of Santa Clarita, City of Los Angeles, City of San Fernando, and Los Angeles County (Section 4.11, "Noise"). Sensitive receptors near 66-kV Subtransmission Line Segments A and B and Telecommunications Routes #1 and #3 would be avoided under the Design Alternative."	Revise as follows: "The proposed 66-kV Subtransmission Line Segments A and B and Telecommunications Routes #1 and #3 would generate noise levels that could exceed applicable daytime allowable noise standards in the City of Santa Clarita, City of Los Angeles, City of San Fernando, and Los Angeles County (Section 4.11, "Noise"). Sensitive receptors near 66-kV Subtransmission Line Segments A and B and Telecommunications Routes #1 and #3 would be avoided under the Design Alternative."
					Under the heading <b>Noise</b> , the references to Telecommunications Routes #1 and #3 should be deleted because the noise analysis presented in Section 4.11 assumed a noise level for construction activities that was not accurate. Construction activities would not generate noise levels in excess of the allowable noise standards. See supplemental information in Exhibit A-5 of the accompanying cover letter that includes the correct noise level information.
					The use of electrical tower/pole replacement and placement noise levels (83 dBA $L_{eq}$ ) for the installation of telecommunication lines is inappropriate. The removal and installation of poles is largely driven by large cranes, auger trucks, cement mixers, and jackhammers and is used as the basis of determining noise impacts in the ACTR DEIR as these are loudest pieces of equipment associated with these activities. Construction noise attributed to installing the



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					telecommunications line is 72 dBA $L_{10}$ at 50 feet or 60 dBA $L_{10}$ or less at distances of 150 feet or greater, a noise level below the city's standard for receptors.
					O2-168 Cont.
155	Chapter 5 Alternatives	5-9	3-7	<p>"The Design Alternative would be environmentally superior in comparison to the proposed project with regard to Aesthetics; Agriculture and Forestry Resources; Hydrology and Water Quality; Land Use and Planning; Geology, Soils, and Mineral Resources; Public Services and Utilities; Recreation; and Transportation and Traffic because impacts on these resource areas from construction and operation of the proposed electrical and telecommunications facilities would be avoided or reduced. The Proposed Project would be environmentally superior or similar in comparison to the Design Alternative with regard to several resource areas, resulting in substantially reduced or similar impacts for these resource areas:</p> <ul style="list-style-type: none"> <li>• Agriculture and Forestry Resources</li> <li>• Air Quality (long term)</li> <li>• Geology, Soils, and Mineral Resources</li> <li>• Greenhouse Gas Emissions</li> <li>• Hazards and Hazardous Materials</li> <li>• Land Use and Planning</li> <li>• Population and Housing</li> <li>• Recreation</li> </ul> <p>The Design Alternative would be environmentally superior in comparison to the Proposed Project with regard to the resource areas listed below.</p>	<p>Delete existing text.</p> <p>"The Design Alternative would be environmentally superior in comparison to the proposed project with regard to Aesthetics; Agriculture and Forestry Resources; Hydrology and Water Quality; Land Use and Planning; Geology, Soils, and Mineral Resources; Public Services and Utilities; Recreation; and Transportation and Traffic because impacts on these resource areas from construction and operation of the proposed electrical and telecommunications facilities would be avoided or reduced. The Proposed Project would be environmentally superior or similar in comparison to the Design Alternative with regard to several resource areas, resulting in substantially reduced or similar impacts for these resource areas:</p> <ul style="list-style-type: none"> <li>• Agriculture and Forestry Resources</li> <li>• Air Quality (long term)</li> <li>• Geology, Soils, and Mineral Resources</li> <li>• Greenhouse Gas Emissions</li> <li>• Hazards and Hazardous Materials</li> <li>• Land Use and Planning</li> <li>• Population and Housing</li> <li>• Recreation</li> </ul> <p>The Design Alternative would be environmentally superior in comparison to the Proposed Project with regard to the resource areas listed below.</p>
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					Under the heading <b>Determination</b> , replace existing text to provide clarity and to be consistent with conclusions presented in revised Table 5-1, as provided in Exhibit A-6 of the accompanying cover letter.

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					because impacts on these resource areas from construction and operation of the proposed electrical facilities would be avoided or reduced. <ul style="list-style-type: none"> <li>• Aesthetics</li> <li>• Biological Resources</li> <li>• Cultural Resources</li> <li>• Hydrology and Water Quality</li> <li>• Noise</li> <li>• Public Services and Utilities</li> <li>• Traffic and Transportation "</li> </ul>	O2-169 Cont.
156	Chapter 5 Alternatives	5-9	30 to 32	"Both the alternative and the proposed project would increase injection capacity at the storage field by approximately 150 million cubic feet per day as required by the terms of the Settlement Agreement (Appendix A)."	Revise as follows: "Both the alternative and the proposed project would increase injection capacity rate at the storage field by approximately 150 million cubic feet per day as required by the terms of the Settlement Agreement (Appendix A)."	Under the heading <b>Growth-Inducing Impacts</b> , the text inaccurately reference an increase in injection capacity at the storage field as a result of the proposed project. However, it is not the injection capacity but the injection rate that will change and allow for greater recycled throughput at the storage field.
157	Chapter 5 Alternatives	5-9	34-40	"Although neither the Design Alternative nor the proposed project is expected to substantially induce growth, the proposed Natural Substation is expandable from 56 to 112 megawatt amperes if needed to accommodate future growth. For this reason, the Design Alternative would be environmentally superior with regard to growth-inducing impacts, because regardless of which type of compressor is installed, the storage field's injection capacity would be increased by approximately the same amount, and hence, an accommodation for increased electrical demand that could be associated with future economic or population growth would be avoided because the	Revise as follows: "Although neither the Design Alternative nor the proposed project is expected to substantially induce growth, the proposed Natural Substation is expandable from 56 to 112 megawatt amperes if needed to accommodate future growth. For this reason, the Design Alternative would be environmentally superior with regard to growth-inducing impacts, because regardless of which type of compressor is installed, the storage field's injection capacity would be increased by approximately the same amount, and hence, an accommodation for increased electrical demand that could be associated with future economic or population growth would be avoided because the	Under the heading <b>Growth-Inducing Impacts</b> , the text inaccurately describes the purpose of the Natural Substation based on need for expansion. However, the Natural Substation is a "dedicated substation", designed with room for spare transformers. Clarifying text should be provided.

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				with future economic or population growth would be avoided because the Natural Substation would not be constructed."	Natural Substation would not be constructed. The Proposed Project or the Design Alternative would not induce growth. The proposed Natural Substation is a "dedicated substation" supplying electricity only for operation the gas storage facility. The Natural Substation would not support any other future SCE customers. New compressors would increase injection rate at the gas storage facility, but both storage capacity and withdrawal rates would remain unchanged. Therefore, the Proposed Project is not growth inducing."
158	Chapter 5 Alternatives	5-10	13-17	"In the City of San Fernando, noise from construction of the proposed project would be exempt from the city's noise standards. Given that the average maximum noise level from construction activities would be 83 dBA Leq, a noise source would be in exceedance of the city's standard for a receptor within 225 feet of the source (Section 4.11, "Noise")."	Revise as follows. "In the City of San Fernando, noise from construction of the proposed project would be exempt from the city's noise standards. Given that the average maximum noise level from construction activities would be 83 dBA Leq, a noise source would be in exceedance of the city's standard for a receptor within 225 feet of the source 72 dBA Leq at 50 feet or 60 dBA Leq at distances of 150 feet or greater, a noise level below the city's standard for receptors. (Section 4.11, "Noise")."
159	Chapter 5 Alternatives	5-12	24-28	"Although the proposed project is not expected to substantially induce growth (Chapter 6, "Cumulative and Growth-Inducing Impacts"), the Natural Substation is expandable from 58 to 112 megawatt amperes if needed to accommodate future growth. For this reason, the No Project Alternative would be environmentally superior with regard to growth-inducing	Under the heading <b>Growth-Inducing Impacts</b> , the text inaccurately describes the Natural Substation; the Natural Substation is a "dedicated substation," designed with room for spare transformers. Clarifying text should be provided.

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				impacts because the Natural Substation would not be constructed."	regard to growth-inducing impacts because the Natural Substation would not be constructed. The Proposed Project would not induce growth. The Proposed Natural Substation is a "dedicated substation" supplying electricity only for operation the gas storage facility. The Natural Substation would not support any other future SCE customers. New compressors would increase injection rate at the gas storage facility, but both storage capacity and withdrawal rates would remain unchanged. Therefore, the Proposed Project is not growth inducing."
160	Chapter 5 Alternatives	5-12	41-48	"The proposed project would be environmentally superior with regard to air quality in comparison to each of the alternatives evaluated in this EIR. For biological resources; cultural and paleontological resources; hazards and noise, the No Project Alternative would be environmentally superior. However, when the Environmentally Superior Alternative is the No Project Alternative, CEQA requires the identification of an Environmentally Superior Alternative among the other alternatives (CEQA Guidelines Section 15126.6). Therefore, the Design Alternative would be environmentally superior with regard to these four resource areas because the analysis presented in this chapter has shown that impacts would be	Under the heading <b>Growth-inducing Impacts</b> , revise text consistent with the revisions presented for Table 5-1 (see Exhibit A-6 of the accompanying cover letter).

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				<p>avoided or reduced in comparison to the proposed project (Section 5.2.1.1)."</p>	<p><del>5.2.1.1.</del> 5.3.1 <u>Proposed Project vs. Design Alternative</u> The Proposed Project would be either environmentally superior or similar in comparison to the Design Alternative with regard to several resource areas, resulting in substantially reduced or similar impacts for these resource areas.</p> <ul style="list-style-type: none"> <li>• <u>Agriculture and Forestry Resources</u></li> <li>• <u>Air Quality (long term)</u></li> <li>• <u>Geology, Soils, and Mineral Resources</u></li> <li>• <u>Greenhouse Gas Emissions</u></li> <li>• <u>Hazards and Hazardous Materials</u></li> <li>• <u>Land Use and Planning</u></li> <li>• <u>Population and Housing</u></li> <li>• <u>Recreation</u></li> </ul> <p>The Design Alternative would be environmentally superior in comparison to the Proposed Project with regard to the resource areas listed below because impacts on these resource areas from construction and operation of the proposed electrical facilities would be avoided or reduced.</p> <ul style="list-style-type: none"> <li>• <u>Aesthetics</u></li> <li>• <u>Biological Resources</u></li> <li>• <u>Cultural Resources</u></li> <li>• <u>Hydrology and Water Quality</u></li> <li>• <u>Noise</u></li> <li>• <u>Public Services and Utilities</u></li> <li>• <u>Traffic and Transportation</u></li> </ul> <p>In comparison to the Proposed Project, the Design Alternative would result in substantially greater long-term impacts to air quality and GHG emissions. For the Design Alternative, cumulative</p>

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				<p>impacts would be greater, while neither alternative would induce growth. Based on the substantially greater impacts associated with the Design Alternative, the Proposed Project is the environmentally superior alternative.</p> <p><b>5.3.2 Proposed Project vs. No Project Alternative</b></p> <p>The Proposed Project would be environmentally superior or similar in comparison to the No Project Alternative with regard to several resource areas, resulting in substantially reduced or similar impacts for these resource areas.</p> <ul style="list-style-type: none"> <li>• Agriculture and Forestry Resources</li> <li>• Air Quality (long term)</li> <li>• Greenhouse Gas Emissions</li> <li>• Hazards and Hazardous Materials</li> <li>• Land Use and Planning</li> <li>• Population and Housing</li> <li>• Recreation</li> </ul> <p>The No Project Alternative would be environmentally superior in comparison to the Proposed Project with regard to the resource areas listed below because impacts on these resource areas from construction and operation of the proposed gas storage facilities and supporting electrical facilities would be avoided or reduced.</p> <ul style="list-style-type: none"> <li>• Aesthetics</li> <li>• Biological Resources</li> <li>• Cultural Resources</li> <li>• Geology, Soils, and Mineral Resources</li> <li>• Hydrology and Water Quality</li> </ul>
				<p>Comment</p> <p>O2-174 Cont.</p>

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					<ul style="list-style-type: none"> <li>Noise</li> <li>Public Services and Utilities</li> <li>Traffic and Transportation</li> </ul> <p>For the No Project Alternative, cumulative impacts would be greater, while neither alternative would induce growth. Based on the substantially greater air quality and GHG emission impacts associated with the No Project Alternative, as well as the No Project Alternative not meeting Project Objectives, the Proposed Project is the environmentally superior alternative."</p>
161	Chapter 5 Alternatives	5-13	1-2	"With regard to temporary construction noise, Routing Alternative A would be environmentally superior to the proposed project because fewer sensitive receptors would be impacted."	<p>Under the heading 5.3 Environmentally Superior Alternative, the text should be revised to accurately describe noise impacts associated with fiber optic installation consistent with the comments and additional analysis presented for noise (See Exhibit A-5 of the accompanying cover letter).</p>
162	Chapter 5 Alternatives	5-13	27-34	"Although long-term impacts on coastal California gnatcatcher and other biological resources would be avoided under the Design Alternative, and a number of short-term construction impacts would be avoided or reduced, the alternative's air quality and GHG emissions impacts would be both long-term and widespread."	<p>Under the heading 5.3 Environmentally Superior Alternative, the text should be revised to accurately describe noise impacts associated with fiber optic installation consistent with the comments and additional analysis presented for noise (See Exhibit A-2 of the accompanying cover letter).</p>

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				<p>impacting resources in addition to those located in proximity to the components of the Design Alternative. Air quality and GHG impacts would also be cumulatively more considerable than under the proposed project (Section 5.2.1.1). Furthermore, while offsets can be purchased for some air quality impacts, and offsets may be negotiated for GHG impacts, mitigation through the purchase of offsets is indirect. Direct mitigation for air pollutant and GHG emissions can be difficult to implement and, in some cases, cannot sufficiently reduce impacts. Therefore, because the proposed project, during operations, would avoid or reduce long-term impacts from air pollutant emissions and result in a net reduction of GHG emissions in comparison to the Design Alternative, and construction noise from Routing Alternative A would impact fewer sensitive noise receptors, the proposed project with Routing Alternative A would be the environmentally superior Alternative and the Proposed Project would be the Environmentally Superior Alternative."</p>	<p>term and widespread, impacting resources in addition to those located in proximity to the components of the Design Alternative. Air quality and GHG impacts would also be cumulatively more considerable than under the proposed project (Section 5.2.1.1). Furthermore, while offsets can be purchased for some air quality impacts, and offsets may be negotiated for GHG impacts, mitigation through the purchase of offsets is indirect. Direct mitigation for air pollutant and GHG emissions can be difficult to implement and, in some cases, cannot sufficiently reduce impacts. Therefore, because the proposed project, during operations, would avoid or reduce long-term impacts from air pollutant emissions and result in a net reduction of GHG emissions in comparison to the Design Alternative, and construction noise from Routing Alternative A would impact fewer sensitive noise receptors, the proposed project with Routing Alternative A would be the environmentally superior Alternative and the Proposed Project would be the Environmentally Superior Alternative."</p>
163	Chapter 6 Cumulative	6-1	43-45	<p>"This table does not include all projects that would contribute to cumulative impacts along the proposed project; rather, it includes a number of concurrent projects in the area to demonstrate the scope and nature of development in Riverside County."</p>	<p>Under the heading 6.1.1 Methodology, the applicable counties within the project area are not presented. Remove reference to Riverside County and revise text to include Los Angeles and Ventura Counties.</p>

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164	Chapter 6 Cumulative	6-18	36-37	"The proposed project would temporarily disturb up to 174.66 acres of land zoned for Agriculture and up to 37 to 50.18 acres of land zoned for Open Space in both Los Angeles and Ventura Counties; however, the proposed project components would not disturb land under active agricultural use. Therefore, the proposed project would not result in a considerable contribution to cumulative impacts on state designated important farmland in Los Angeles or Ventura Counties."	Revise as follows: "The proposed project would temporarily disturb up to 174.66 acres of land zoned for Agriculture and up to 37 to 50.18 acres of land zoned for Open Space in both Los Angeles and Ventura Counties; however, the proposed project components would not disturb land under active agricultural use, and no impacts to agricultural resources would occur. Therefore, the proposed project would not result in a considerable contribution to cumulative impacts on state designated important farmland in Los Angeles or Ventura Counties."	Under the heading <b>Cumulative Impact Analysis</b> , the text inaccurately presents land disturbance for the project. In addition, the proposed project would not: <ul style="list-style-type: none"> <li>• Conflict with existing zoning for agricultural use or a Williamson Act contract;</li> <li>• Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use</li> <li>• Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance</li> <li>• Conflict with existing zone for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production</li> <li>• Result in the loss of forest land or conversion of forest land to non-forest use</li> </ul> Therefore, there are No Impacts to Agricultural and Forestry Resources...
165	Chapter 6 Cumulative	6-27	36-38	"Given that the proposed project's impact on this resource area would be minor at most, the proposed project would not result in a considerable contribution to cumulative impacts related to population and housing."	Revise as follows: "Given that the proposed project's project would have no impact on this resource area <del>would be minor at most</del> , the proposed project would not result in a considerable contribution to cumulative impacts related to population and housing."	Under the heading <b>6.1.3.12 Population and Housing</b> , the text referencing the impact determination should be revised for consistency with corrections to Chapter 4.
166	Chapter 6 Cumulative	6-28	48	"Increasing injection capacity would allow the applicant to purchase and store a greater."	Revise as follows: "Increasing injection capacity <del>rate</del> would allow the applicant to purchase and store a greater."	Under the heading <b>6.2 Growth Inducing Impacts</b> , the text inaccurately reference an increase in injection capacity at the storage field as a result of the proposed project. However, it is not the injection capacity but the injection rate that will change and allow for greater recycled throughput at

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Master Comment Table					
Comment No.	Section	Page	Lines	Original Text	Suggested Revision
167	Chapter 6 Cumulative	6-29	21-22	<p>"Space would be available at the proposed Natural Substation for the installation of up to two additional 28-megavolt-ampere (MVA) transformers (for a total of 112 MVA) if needed to accommodate a future increase in the demand for electrical power if such an increase should occur. At this time, SCE does not anticipate that future demand for electrical power would dictate the need for expansion of the proposed substation. Any expansion of the proposed Natural Substation would be conducted in response to growth rather than as an inducement to it. Therefore, because the proposed project would not result in increases in employment, housing, or demands for community facilities and services nor result in the removal of existing constraints to growth of the creation of factors that encourage or otherwise facilitate development that would not otherwise have occurred, its implementation would not have growth inducing impacts."</p>	<p>Revise as follows:  <u>"The Proposed Project would not induce growth. The proposed Natural Substation is a "dedicated substation" supplying electricity only for operation the gas storage facility. The Natural Substation would not support any other future SCE customers. Space would be available at the proposed Natural Substation for the installation of up to two additional spare 28-megavolt-ampere (MVA) transformers, for a total of 112 MVA) if needed for reliability, to accommodate a future increase in the demand for electrical power if such an increase should occur. At this time, SCE does not anticipate that future demand for electrical power would dictate the need for expansion of the proposed substation. Any expansion of the proposed Natural Substation would be conducted in response to growth rather than as an inducement to it. New compressors would increase injection rate at the gas storage facility, but both storage capacity and withdrawal rates would remain unchanged. Therefore, because the proposed project would not result in increases in employment, housing, or demands for community facilities and services nor result in the removal of existing constraints to growth of the creation of factors that encourage or otherwise facilitate development that would not otherwise have occurred, its implementation would not have growth inducing impacts."</u></p>
				the storage field	O2-180 Cont.
					O2-181 Under the heading <b>6.2 Growth Inducing Impacts</b> , revise text to correctly describe the substation function and future storage facility operations.

APPENDIX A  
SoCalGas's Aliso Canyon Turbine Replacement (ACTR) Project  
Comments to the Draft EIR

Master Comment Table					
Comment No.	Section	Page	Lines	Original Text	Suggested Revision
168	Chapter 6 Cumulative	6-30	10-13	<p>"During operations, the proposed compressors would increase the storage field's natural-gas injection capacity from approximately 300 million cubic feet per day to approximately 450 million cubic feet per day, but the storage field's withdrawal capacity would not change. Increasing injection capacity would allow the applicant to purchase and store a greater amount of natural gas during periods of low demand when natural gas is less expensive. This, in turn, would lower the cost of natural gas services provided by the storage field. Although increasing injection capacity would not have a direct effect on the withdrawal of natural gas, the proposed compressors would use electricity instead of combusting natural gas. Therefore, a local reduction of natural gas consumption would result from operation of the proposed project. Given that natural gas is one of the nonrenewable resources combusted to produce electricity, however, a net reduction in natural gas combustion is not anticipated from operation of the proposed project."</p>	<p>Revise as follows:</p> <p>"During operations, the proposed compressors would increase the storage field's natural-gas injection capacity from approximately 300 million cubic feet per day to approximately 450 million cubic feet per day, but the storage field's withdrawal capacity would not change. Increasing injection capacity would allow the applicant to purchase <del>and store</del> a greater amount of natural gas during periods of low demand when natural gas is less expensive. This, in turn, would lower the cost of natural gas services provided by the storage field. Although increasing injection <del>capacity</del> rate would not have a direct effect on the withdrawal of natural gas, the proposed compressors would use electricity instead of combusting natural gas. Therefore, a local reduction of natural gas consumption would result from operation of the proposed project. <del>Given that</del> Although natural gas is one of the nonrenewable resources combusted to produce electricity, electricity is produced from multiple sources: hydro-electric, nuclear, solar, wind, and geothermal. Therefore, a net reduction in natural gas combustion is <del>not</del> anticipated from operation of the proposed project."</p>
					<p>O2-182</p> <p>Under the heading <b>6.4 Significant and Irreversible Environmental Changes</b>, the text inaccurately describes the processes at the storage field. Revise to correct technical errors in paragraph.</p>
169	Chapter 7 Mitigation Monitoring Plan	7-1	n/a	<p>"This MMP is a draft program, and would be finalized if the CPUC approves the revised project, including the Phase 3 Expansion. At that time final mitigation measures would be incorporated into the program and the roles and responsibilities</p>	<p>Revise as follows:</p> <p>"This MMP is a draft program, and would be finalized if the CPUC approves the <del>proposed project</del>, including the <del>Phase 3 Expansion</del>. At that time final mitigation measures would be incorporated into the program and the roles and</p>
					<p>O2-183</p> <p>Under the heading <b>7.0 Mitigation Monitoring Plan</b>, language is included that references Phase 3 Expansion which is not representative of the proposed project. Delete text.</p>

APPENDIX A  
SoCalGas's Aliso Canyon Turbine Replacement (ACTR) Project  
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Master Comment Table					
Comment No.	Section	Page	Lines	Original Text	Suggested Revision
				for their implementation refined."	responsibilities for their implementation refined.
170	Mitigation Monitoring Plan	7-46	APM HZ-8, 2 d.	"An onboard self extinguishing fire suppression system capable of extinguishing any equipment-caused fire to be kept on heavy construction operating equipment"	Revise as follows: "An onboard self extinguishing fire suppression system capable of extinguishing any equipment-caused fire to be kept on heavy construction operating equipment"
171	Mitigation Monitoring Plan	7-49	APM HZ-8, 4 a.	"The applicant and SCE or the respective construction contractors shall furnish any and all forces and equipment to extinguish any uncontrolled fire near the project component areas as directed by Fire Department or CAL FIRE representatives;"	In Table 7-1 MMRP, APM HZ-8 is presented as an applicant. However this was not proposed by the applicant. Revise consistent with the APM provided on 12/8/11 or revise as mitigation. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter.
172	Mitigation Monitoring Plan	7-49	APM HZ-8, 4 c.	"In the event that the applicant and SCE or the respective construction contractors sets fire to incinerate cleared vegetation..."	In Table 7-1 MMRP, APM HZ-8 is presented as an applicant. However this was not proposed by the applicant. Revise consistent with the APM provided on 12/8/11 or revise as mitigation. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter.
173	Mitigation Monitoring Plan	7-49, 50	APM HZ-8, 5.	"5. Measures will also include additional, special provisions for days when the National Weather Service issues a Red Flag Warning. Standard protocols implemented during these periods will include: a. Measures to address storage and parking areas; b. Measures to address the use of gasoline-powered tools; c. Procedures for road closures as	In Table 7-1 MMRP, APM HZ-8 is presented as an applicant. However this was not proposed by the applicant. Revise consistent with the APM provided on 12/8/11 or revise as mitigation. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter.

APPENDIX A  
SoCalGas's Aliso Canyon Turbine Replacement (ACTR) Project  
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Master Comment Table					
Comment No.	Section	Page	Lines	Original Text	Suggested Revision
				d. Procedures for use of a fire guard as necessary, and e. Additional fire suppression tools and fire suppression equipment, and training requirements."	d. Procedures for use of a fire guard as necessary, and e. Additional fire suppression tools and fire suppression equipment, and training requirements."
174	Mitigation Monitoring Plan	7-50	APM HZ-2	"Plant Power Line Inspection and Maintenance. After construction, the applicant will inspect and maintain the Plant Power Line on at least a monthly basis for the purpose of reducing wildfire hazards."	Revise as follows: "Plant Power Line Inspection and Maintenance. After construction, the applicant will inspect and maintain the Plant Power Line on at least a monthly basis for the purpose of reducing wildfire hazards."
175	Appendix E2 Figure 2	n/a	n/a		Revise figure – see comments provided
176	Appendix E4 Section 1.1	n/a	n/a	"For each surveyed tree, information was collected on tree location, health, habitat, understory species, and potential project activity that would impact individual trees or overall oak tree woodland environments."	Revise as follows: "For each surveyed tree, information was collected on tree location, health, habitat, understory species, and potential project activity that would impact individual trees or overall oak tree woodland environments."
177	Appendix E7 Section 4.0	n/a	n/a	"APM-BR-08: Pursuant to city of Santa Clarita/Los Angeles County ordinance guidelines"	Revise as follows: "APM-BR-08: Pursuant to city of Santa Clarita, Ventura, and Los Angeles County ordinance guidelines"
					In Table 7-1 MMRP, APM HZ-2, the applicable requirement should reference an annual visual inspections and 3 to 5 year detailed inspections depending on the equipment. Monthly inspections greatly exceeds GO-165 requirements and SDG&E's CMP manual. SoCalGas does both visual and detailed inspections annually. Text should be deleted. See revised Table ES-1 as provided in Exhibit A-1 of the accompanying cover letter.
					Gnatcatcher surveys also occurred at the landfill site where the 66kV towers cross parcel
					In Section 1.1 of Appendix E-4, there is a typo that should be corrected for clarity.
					In Section 4.0 of Appendix E-7, APM BR-8 should include all applicable counties within the project area. Ventura County should be included for accuracy.

## EXHIBIT A-1

Comment O2-192  
refers to all Exhibit A-1  
(except for O2-193 on  
page 21 of this Exhibit)

Exhibit A-1: Revised Table ES-1 and 7-1

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
<b>4.1 Aesthetics</b>			
<i>Impact AE-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area</i>	<b>APM AE-1: Night Lighting.</b> The applicant and SCE will ensure that construction activities occurring at night will use lighting to protect the safety of the construction workers but orient the lights to minimize their effect on any nearby sensitive receptors. The lighting will be directed downward and shielded to eliminate offsite light spill at times when the lighting might be in use.	Confirm that construction lighting is oriented to minimized effects on nearby sensitive receptors (APM AE1).	During construction
<b>4.2 Agriculture</b>	No applicable APMs or mitigation measures.		
<b>4.3 Air Quality</b>			
<i>Impact AQ-3: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment.</i>	<p><b>APM AQ-1: Maintain Engines in Good Working Condition.</b> The applicant and SCE will ensure that equipment engines will be maintained in good condition and in proper tune as per the manufacturers' specifications.</p> <p><b>APM AQ-2: Minimization of Equipment Use.</b> The applicant and SCE will ensure that staff and daily construction activities will be efficiently scheduled to minimize the use of unnecessary/duplicate equipment when possible.</p> <p><b>APM AQ-3 Minimization of Disturbed Areas.</b> The applicant and SCE will ensure that the amount of area disturbed by clearing, grading, earth moving, or excavation operations is minimized to reduce the amount of fugitive dust that is generated during construction in a manner that meets or exceeds the requirements of the South Coast Air Quality Management District's Rule 403 (Fugitive Dust Regulations).</p> <p><b>APM AQ-4: Watering Prior to Grading and Excavation.</b> The applicant and SCE will ensure that pre-grading/excavation activities will include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water (preferably reclaimed, if available) will penetrate sufficiently to minimize fugitive dust during grading activities.</p> <p><b>APM AQ-5: Vehicle Speed Limits.</b> The applicant will post signs in the storage field along designated travel routes and limiting traffic to 15 miles per hour or less on unpaved roads.</p> <p><b>APM AQ-6: Fugitive Dust from High Winds.</b> During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), the applicant</p>	<p>Confirm that <del>Regional Clean-Air Incentive Market Trading</del> Mobile Source Emission Reduction Credits are purchased as specified in MM AQ-2. See additional requirements for APMs AQ-1 through AQ-7 and MMs AQ-1 and AQ-2.</p>	Prior to and during construction

Exhibit A-1: Revised Table ES-1 and 7-1

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) and SCE will ensure that all clearing, grading, earth moving, and excavation operations during project construction will be curtailed to the degree necessary to prevent fugitive dust created by onsite activities and operations from being a nuisance or hazard, either offsite or onsite. <b>APM AQ-7:</b> Cleaning of Paved Roads. The applicant and SCE will ensure that paved road surfaces will use vacuum sweeping and/or water flushing to remove buildup of loose material to control dust emissions from travel on paved access roads (including adjacent public streets impacted by construction activities) and paved parking areas. <b>MM AQ-1:</b> Oxides of Nitrogen (NOx) Credits. The emissions of NOx due to construction of the proposed project will be mitigated through the purchase of Regional Clean Air Incentive Market Trading Mobile Source Emission Reduction Credits (RTCs) for every pound of NOx emissions in excess of the SCAQMD daily significance threshold of 100 pounds per day. The total amount of NOx <del>RTCs</del> MSERCs to be purchased will be calculated when the construction schedule and operating conditions are finalized. The applicant will purchase <del>and submit</del> the required RTCs MSERCs to the SCAQMD prior to the start of project construction. The applicant will also track actual daily emissions during construction according to a monitoring plan that includes records of equipment and vehicle usage. <b>MM AQ-2: Tier 3 Off-Road Emissions Standards.</b> All off-road diesel-powered construction equipment greater than 50 horsepower used during reconductoring of the 66-kV subtransmission line will meet Tier 3 off-road emissions standards.	Monitoring Requirements	Timing
4.4 Biological Resources			



Exhibit A-1: Revised Table ES-1 and 7-1

Impact <i>Impact BR-1: Substantial adverse direct or indirect effect on special status species.</i>	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p><i>Coastal California Gnatcatcher Habitat (Including Critical Habitat)</i></p> <p><b>APM AQ-3:</b> Minimization of Disturbed Areas. See above.</p> <p><b>APM AQ-4:</b> Watering Prior to Grading and Excavation. See above.</p> <p><b>APM BR-2:</b> Designated Work Zones and Sensitive Resource Avoidance. Prior to ground-disturbing activities, the applicant and SCE will ensure that work zones are clearly staked and flagged. Construction work areas will be identified to ensure that construction activities, equipment, and associated activities are confined to designated work zones and areas supporting sensitive resources (special-status plants and wildlife, and high-value habitats, such as wetlands) are avoided.</p> <p><b>APM BR-3:</b> Post-Construction Restoration for Reconductoring. SCE will ensure that all areas that are temporarily disturbed during 66-kV subtransmission line reconductoring will be restored as close to preconstruction conditions as possible or to the conditions agreed upon between the landowner and SCE following completion of construction of the proposed project.</p> <p><b>APM BR-4:</b> Preconstruction Gnatcatcher Surveys. The applicant and SCE will ensure that protocol-level pre-construction surveys will be conducted for coastal California gnatcatcher in project component areas where suitable habitat exists and for all project activities proposed within U.S. Fish and Wildlife Service-designated critical habitat in accordance with the U.S. Fish and Wildlife Service Coastal California Gnatcatcher (Polioptila californica californica) Presence/Absence Survey Guidelines, February 28, 1997. In the event that coastal California gnatcatcher are observed in pre-construction surveys, a buffer of 500 feet from any active nest will be flagged and maintained by a biological monitor. Areas of 2 or more contiguous acres of suitable coastal California gnatcatcher habitat will be identified at the time of pre-construction surveys. If infeasible to maintain a buffer of 500 feet from an active gnatcatcher nest, and work within or near these areas will be performed outside of the breeding and nesting season (coastal California gnatcatcher breeding/nesting season is approximately February 15 through August 30).</p>	<ul style="list-style-type: none"> <li>Ensure that the applicant and SCE conduct preconstruction surveys for wildlife and plant species as specified in APM BR-1a through APM BR-1d.</li> <li>Ensure that the applicant and SCE conduct protocol-level pre-construction surveys for coastal California gnatcatcher as specified in APM BR-4 and least Bell's vireo and southwestern willow flycatcher as specified in MM BR-8.</li> <li>Ensure that SCE conducts surveys of vegetation and estimates the total area of intact Venturan Coastal Sage Scrub (MM BR-2) and prepares a Habitat Restoration Plan for Venturan Coastal Sage Scrub (MM BR-3).</li> <li>Ensure that the applicant and SCE complete formal delineations per USACE protocols as specified in MM BR-5.</li> <li>Ensure that the applicant and SCE design all transmission structures as specified in MM BR-6 and implement avian protection plans as specified in MM BR-7.</li> <li>Ensure that the applicant and SCE conduct pre-construction nesting surveys for golden eagle as specified MM BR-9.</li> <li>Ensure that the applicant and SCE conduct pre-construction surveys for Plummer's mariposa lily and slender mariposa lily as specified MM BR-10. See above/below for APMs AQ-3, AQ-4, GE-3, and HZ-6. See additional requirements for APMs BR-1 through BR-8 and MMs BR-1 through BR-11.</li> </ul>	<p>Prior to, during, and after construction</p>

Exhibit A-1: Revised Table ES-1 and 7-1

Impact	Applicant Proposed Measures (APIs) and Mitigation Measures (MIs)	Monitoring Requirements	Timing
Impact	<p><b>API BR-5: Exclusionary Fencing.</b> The applicant and SCE will ensure that exclusionary fencing will be installed around work and laydown/staging areas, where necessary, to prevent inadvertent encroachment into the native habitat adjacent to areas of impact. Brightly colored, protective construction fencing and/or silt fencing will be erected surrounding the work area where it abuts native habitat prior to the start of construction and/or demolition.</p> <p><b>API BR-6: Biological Monitoring.</b> The applicant and SCE will ensure that biological monitoring will be conducted during construction in all areas within 100 feet of native vegetation that has the potential, or is known, to provide habitat for special status species.</p> <p><b>API GE-3: Erosion and Sediment Control.</b> See above.</p> <p><b>API HZ-65: Worker Environmental Awareness Training.</b> See below.</p> <p><b>MM BR-1: Trimming of Vegetation.</b> In order to minimize the removal of vegetation in areas of habitat for the coastal California gnatcatcher, for the 66-kV subtransmission line, Telecommunications Route #2, and proposed Natural Substation project areas, SCE will ensure that trimming of all native vegetation, riparian vegetation, and vegetation that provides potential habitat for coastal California gnatcatcher will be monitored by a qualified biologist. Trimming of native trees and native arborescent shrubs will be monitored by a qualified arborist performed by a certified arborist or a person with a minimum of 6 years' regional expertise in trimming trees/shrubs in this area and who has worked under a certified arborist.</p> <p><b>MM BR-2: Minimize Removal of Venturan Coastal Sage Scrub.</b> For the 66-kV subtransmission line, Telecommunications Route #2, and proposed Natural Substation project areas, SCE will minimize the removal of Venturan Coastal Sage Scrub associations, particularly within designated critical habitat for the coastal California gnatcatcher. Prior to construction and for each of these project areas, SCE will:</p> <ol style="list-style-type: none"> <li>1. Ensure that a survey of vegetation and estimate of the total area of intact Venturan Coastal Sage Scrub is completed by a qualified botanist familiar with this vegetation association.</li> <li>2. Avoid removal of more than 10 percent of intact Venturan Coastal Sage Scrub within a single project area. "Project Areas" are defined as:</li> </ol>		

Exhibit A-1: Revised Table ES-1 and 7-1

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>a. Storage field project components (including the proposed Natural Substation) areas of ground disturbance during construction, 300 linear feet, with a 100-foot buffer on either side of the road; and</p> <p>b. Access and other roads that would be constructed/modified, 300 linear feet, with a 100-foot buffer on either side of the road; and</p> <p>c. 66-kV line and Telecommunications Route #2, for each pole, a 100-foot radius around the base, plus 100 feet</p> <p>along each extent of the linear ROW beyond the 100-foot radius area.</p> <p>3. Ensure that areas of intact, contiguous Venturan Coastal Sage Scrub shall not be reduced below a 2-acre threshold. In the event that the applicant wishes to remove more than 10 percent of intact Venturan Coastal Sage Scrub within a single project area, or where intact, contiguous areas of Venturan Coastal Sage Scrub may be reduced below a 2-acre threshold, the applicant will compensate for this loss through the restoration and/or creation of Venturan Coastal Sage Scrub habitat per the applicant's Habitat Restoration Plan for Venturan Coastal Sage Scrub, at a minimum ratio of 2:1 (for example, 2 acres of Venturan Coastal Sage Scrub created or restored for every 1 acre impacted).</p> <p><b>MM BR-3: Habitat Restoration Plan for Venturan Coastal Sage Scrub.</b> Prior to construction of the proposed project, and with the coordination and review of USFWS and CDFG, the applicant and SCE will prepare a habitat restoration plan for Venturan Coastal Sage Scrub associations for the 66-kV subtransmission line, Telecommunications Route #2, and proposed Natural Substation project areas. The restoration plan will be prepared by a qualified botanist familiar with this vegetation association. Per the requirements of MM BR-2, Venturan Coastal Sage Scrub habitat occurring in these work areas will be identified and quantified; surveys (including vegetation maps) and quantification of Venturan Coastal Sage Scrub habitat will be included in the restoration plan. Restoration will occur at a minimum ratio of 0.5:1 (0.5 acres of Venturan Coastal Sage Scrub created or restored for every 1 acre impacted during project construction), and may be completed by:</p> <ol style="list-style-type: none"> <li>1. Establishing Venturan Coastal Sage Scrub habitat within the project areas (onsite);</li> <li>2. Establishing Venturan Coastal Sage Scrub habitat outside the project areas (offsite); or</li> </ol>		

Exhibit A-1: Revised Table ES-1 and 7-1

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>3. Purchase of credits and/or mitigation lands at a ratio above 0.5:1 from an entity reviewed and approved by the USFWS and/or CDFG. Details of the restoration plan will be finalized pending consultation between SCE and USFWS and CDFG. For Options 1, and 2, (establishing Venturan Coastal Sage Scrub onsite or offsite), the plan will include the following elements: planting/seeding palettes; monitoring and contingency program; monitoring schedule, including duration and performance criteria (a minimum of 80 percent successful plant establishment after a minimum of three years); and any specific measures that will be required to ensure success of the restoration effort.</p> <p><b>MM BR-4: Restriction of Vehicular Traffic.</b> The applicant and SCE will ensure that, in all project construction areas, vehicular traffic (including movement of all equipment) is restricted to established access roads indicated by flagging and signage. All access roads that are not otherwise assigned official speed limits will be restricted to a speed limit of a maximum of 20 miles per hour.</p> <p><b>Special Status Amphibians and Reptiles</b></p> <p><b>APM AQ-3: Minimization of Disturbed Areas.</b> See above.</p> <p><b>APMs BR-2, BR-5, and BR-6.</b> See above.</p> <p><b>APM GE-3: Erosion and Sediment Control.</b> See above.</p> <p><b>APM HZ-6: Worker Environmental Awareness Training.</b> See below.</p> <p><b>MM BR-5: Impacts on Hydrologic Features.</b> Prior to project construction, for all proposed project components in the vicinity of hydrologic features, the applicant and SCE will:</p> <ol style="list-style-type: none"> <li>1. Complete formal delineations per USACE protocols to confirm and determine the extent of jurisdictional wetlands present in the proposed project areas;</li> <li>2. Consult with the USACE and CDFG to determine whether CWA Section 404 permits and California Department of Fish and Game Code Section 1600 Streambed Alteration Agreements are necessary for the proposed project, apply for these permits as needed, and determine the area of fill that would require compensation;</li> <li>3. Commit to compensatory mitigation for any wetland fill per any required permits and in consultation with USACE and CDFG (wetland fill requiring</li> </ol>		

Exhibit A-1: Revised Table ES-1 and 7-1

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>mitigation will be compensated for at a minimum ratio of 0.5:1, or 0.5 acres of wetland creation or restoration for every 1 acre of wetland fill caused by the proposed project); and</p> <p>4. Ensure that biological monitors establish and maintain a minimum exclusionary buffer of 50 feet from the delineated extent of all jurisdictional wetland features during project construction. Construction of any proposed project component that requires altering, removing, or filling the bed or bank of seasonal drainages, or other jurisdictional or potentially jurisdictional water features, and/or cannot maintain the 50-foot exclusionary buffer, will be performed only when water is not present in the feature.</p> <p><b>Special Status Birds</b></p> <p><b>APM AQ-3: Minimization of Disturbed Areas.</b> See above.</p> <p><b>APM BR-1a: Preconstruction Surveys.</b> Prior to construction and activities that may include vegetation clearing, staging and stockpiling, or other activities with the potential to directly or indirectly affect wildlife, the applicant and SCE will ensure that preconstruction surveys are conducted by qualified biologists for sensitive biological resources, including special-status wildlife and special-status plant species, in the project component areas including access roads and staging areas.</p> <p><b>APM BR-1b: Exclusionary Fencing.</b> In the event that special-status wildlife and special-status plants are identified within a proposed project component area or vicinity (survey buffer), buffers will be established by temporary flagging or fencing (this distance may be greater depending on the species and construction activity, as determined by the biologist) between the identified resource and construction activities. Flagging and fencing will be performed or supervised by a qualified biologist to ensure that these activities are conducted without harm to sensitive species, or habitat flagging and fencing will be performed or supervised by a qualified biologist to ensure that these activities are conducted without harm to sensitive species or habitat. The information gathered from these surveys will be used to determine project planning and minimize impacts on sensitive resources from project-related activities. In addition, the results of these surveys will be used to determine the extent to which environmental specialist construction monitors will be required.</p> <p><b>APM BR-1c: Nesting Bird Surveys.</b> For nesting birds, a field survey will be conducted by a qualified biologist to determine if active nests of bird species</p>		

Exhibit A-1: Revised Table ES-1 and 7-1

Impact	Monitoring Requirements	Timing
<p><b>Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)</b> protected by the Migratory Bird Treaty Act and/or the California Fish and Game Code are present in the construction zone or within a minimum of 100 feet (500 feet for raptors) of the construction zone. In the event of the identification of nesting birds within a proposed project component area or vicinity, a minimum 50-foot exclusionary buffer will be established by temporary flagging or fencing (this distance may be greater, depending on the bird species and construction activity, as determined by the biologist) between the nest site and construction activities. Clearing and construction within the fenced area will be postponed or halted (except for vehicle traffic on existing roads), at the discretion of the biological monitor, until the nest is vacated and juveniles have fledged.</p> <p><b>APM BR-1d: Construction Monitoring.</b> The biologist shall serve as a construction monitor during those periods when construction activities occur near active nest areas to ensure that no inadvertent impacts on these nests will occur. Biological monitoring will be conducted during construction work in areas in close proximity to native habitat to assure project compliance with all APMs and Mitigation Measures.</p> <p><b>APMs BR-2 through BR-6.</b> See above.</p> <p><b>APM BR-7: Wildlife Relocation and Protection.</b> During construction activities, wildlife resources that are not considered to have special status and are determined to be in harm's way may be relocated by the applicant and SCE and/or their construction contractors to native habitat near the work area but outside the construction impact zone in order to avoid injury or mortality. Only agency authorized biologists may relocate special status species. For the trench to be excavated in the area of the Central Compressor Station during construction for the purposes of pipeline installation, the applicant will ensure that open trenches are inspected twice daily, once in the morning before activities commence and once at the end of the day or before backfilling of the trench would occur within 72 hours of pipeline installation to preclude potential impacts to wildlife that may fall into the trench. At the conclusion of each day's trenching activity, the end of the trench would be left ramped at an approximate 2-to-1 slope to allow any wildlife falling into the trench to escape.</p> <p><b>APM BR-8: Oak Tree Impact Avoidance.</b> In accordance with City of Santa Clara/Los Angeles County ordinance and policy guidelines, the applicant and SCE will ensure that loss or impacts to all native oak trees via trimming or ground disturbance within the dripline (i.e., the outermost extent of the canopy) will be</p>		

Exhibit A-1: Revised Table ES-1 and 7-1

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) avoided using specific measures and/or agency guidance. All activities that have the potential to adversely affect oak trees (i.e. trimming, excavation, paving, removal) will be monitored by a qualified arborist. If impacts cannot be avoided, the applicant or SCE will replace damaged or removed oak trees at a 2:1 ratio. Plantings will be 15 gallon containers in areas deemed suitable by the arborist. If impacts cannot be avoided, the applicant or SCE will submit an Oak Tree Permit Application (including an Oak Tree Report) to Los Angeles County and obtain an Oak Tree Permit prior to construction.	Monitoring Requirements	Timing
	<p><b>APM GE-3:</b> Erosion and Sediment Control. See above.</p> <p><b>APM HZ-65:</b> Worker Environmental Awareness Training. See below.</p> <p><b>APM HZ-76:</b> Wood Pole Recycling and Disposal. See above.</p> <p><b>MM BR-1</b> through <b>MM BR-5</b>. See above.</p> <p><b>MM BR-6:</b> Avian Safe Building Standards. The applicant and SCE will design all transmission structures installed as part of the proposed project to be consistent with the Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 2006 (APLIC 2006).</p> <p><b>MM BR-7: Avian Protection Plans.</b> Prior to construction, the applicant and SCE will develop and implement avian protection plans according to Avian Protection Plan (APP) Guidelines (APLIC &amp; USFWS 2005). The avian protection plans will include provisions to reduce impacts on avian species during construction and operation of the proposed project, including measures to reduce impacts on nesting birds, and will provide for the adaptive management of project-related issues. The Avian Protection Plans will be reviewed and approved by the CDFG and USFWS prior to construction.</p> <p><b>MM BR-8: Pre-Construction Surveys for Least Bell's Vireo and Southwestern Willow-Flycatcher.</b> Prior to construction, the applicant and SCE will complete protocol-level surveys for least Bell's vireo and southwestern-willow-flycatcher in areas of suitable or potentially suitable habitat in the proposed project component areas. Surveys will be completed by a permitted biologist(s) according to the survey protocol for least Bell's vireo (USFWS 2001) and southwestern-willow-flycatcher (Sogge et al., 2010). Whenever least Bell's vireo or southwestern-willow-flycatcher territory or nest sites are confirmed, the applicant and/or SCE will notify the USFWS and CDFG immediately upon return from the field. In the event that any least Bell's</p>		

Exhibit A-1: Revised Table ES-1 and 7-1

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) for vireos or southwestern-willow-flycatchers or their nests are observed, biologists will establish and maintain a minimum 500-foot exclusionary buffer by installing temporary flagging or fencing between the nest site and construction activities. Federal endangered species recovery permits are not required for least Bell's vireo surveys, but are required in all USFWS regions where the southwestern-willow flycatcher breeds (application forms can be downloaded at <a href="http://www.fws.gov/ftrms/G-200-55.pdf">http://www.fws.gov/ftrms/G-200-55.pdf</a> ). State survey permits also may be required from the CDFG for both species.	Monitoring Requirements	Timing
<p><b>MM BR-9: Nesting Golden Eagle.</b> Nesting surveys for golden eagles will be completed per the most recent USFWS survey guidelines by the applicant and SCE prior to project construction and will include areas within 660 feet of proposed project components located within suitable golden eagle nesting habitat. If surveys identify nesting golden eagles within 660 feet of the proposed project component areas, the applicant and SCE will ensure that all construction activities within 660 feet of the nest occur outside of the nesting season (January through June, subject to adjustment based on field observations). The nest will be monitored from outside the 660-foot buffer by a qualified raptor ecologist with demonstrated experience monitoring eagles and knowledge of normal eagle nesting behavior. In the event that the raptor ecologist observes abnormal behavior or notes any sign of potential disturbance to the nesting birds, the ecologist will ensure that work will be stopped within 1,320 feet of the nest. Work can continue within the buffered area(s) after the raptor ecologist determines that the chicks have fledged and the nest is not active for the season. In the event that golden eagle nests are identified on structures to be removed or modified, the structures will be left in place pending consultation with the USFWS and CDFG.</p> <p><b>Special Status Mammals</b></p> <p><b>APM AQ-3: Minimization of Disturbed Areas.</b> See above.</p> <p><b>APM BR-2: Designated Work Zones and Sensitive Resource Avoidance.</b> See above.</p> <p><b>APM BR-3: Post-construction Restoration for Reconductoring.</b> See above.</p> <p><b>APM BR-5: Exclusionary Fencing.</b> See above.</p> <p><b>APM BR-6: Biological Monitoring.</b> See above.</p> <p><b>APM BR-8: Oak Tree Impact Avoidance.</b> See above.</p>	<p><b>APM BR-9: Nesting Golden Eagle.</b> Nesting surveys for golden eagles will be completed per the most recent USFWS survey guidelines by the applicant and SCE prior to project construction and will include areas within 660 feet of proposed project components located within suitable golden eagle nesting habitat. If surveys identify nesting golden eagles within 660 feet of the proposed project component areas, the applicant and SCE will ensure that all construction activities within 660 feet of the nest occur outside of the nesting season (January through June, subject to adjustment based on field observations). The nest will be monitored from outside the 660-foot buffer by a qualified raptor ecologist with demonstrated experience monitoring eagles and knowledge of normal eagle nesting behavior. In the event that the raptor ecologist observes abnormal behavior or notes any sign of potential disturbance to the nesting birds, the ecologist will ensure that work will be stopped within 1,320 feet of the nest. Work can continue within the buffered area(s) after the raptor ecologist determines that the chicks have fledged and the nest is not active for the season. In the event that golden eagle nests are identified on structures to be removed or modified, the structures will be left in place pending consultation with the USFWS and CDFG.</p> <p><b>Special Status Mammals</b></p> <p><b>APM AQ-3: Minimization of Disturbed Areas.</b> See above.</p> <p><b>APM BR-2: Designated Work Zones and Sensitive Resource Avoidance.</b> See above.</p> <p><b>APM BR-3: Post-construction Restoration for Reconductoring.</b> See above.</p> <p><b>APM BR-5: Exclusionary Fencing.</b> See above.</p> <p><b>APM BR-6: Biological Monitoring.</b> See above.</p> <p><b>APM BR-8: Oak Tree Impact Avoidance.</b> See above.</p>		



**Exhibit A-1: Revised Table ES-1 and 7-1**

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>APM GE-3: Erosion and Sediment Control. See below.</p> <p>APM HZ-65: Worker Environmental Awareness Training. See below.</p> <p><i>Special Status Plants</i></p> <p>APM AQ-3: Minimization of Disturbed Areas. See above.</p> <p>APM AQ-4: Watering Prior to Grading and Excavation. See above.</p> <p>APMs BR-1 through BR-6 and APM BR-8. See above.</p> <p>APM HZ-65: Worker Environmental Awareness Training. See below.</p> <p>MM BR-4: Restriction of Vehicular Traffic. See above.</p> <p>MM BR-10: Restoration of Plummer's Mariposa Lily and Slender Mariposa Lily.</p> <p>The applicant and SCE will complete pre-construction surveys during the appropriate blooming period to identify Plummer's mariposa lily and slender mariposa lily populations in the proposed project component areas at the storage field and in the area of the 66-kV subtransmission line.</p> <p>Plummer's mariposa lily and slender mariposa lily plants will be identified by a qualified biologist and flagged or surrounded with fencing in such a way that disturbance of the populations will be avoided. In the event that populations or individuals of either species cannot be avoided, restoration will occur. The applicant will develop and implement a restoration plan for both plants which will be reviewed and approved by CDFG prior to project construction. Restoration will occur after construction and to an extent such that "no net loss" (i.e., replacement of destroyed plants at a 1:1 ratio) is ensured for all plants of either species in the proposed project component areas. Restoration may be completed by:</p> <ol style="list-style-type: none"> <li>1. Establishing Plummer's mariposa lily and slender mariposa lily plants within the proposed project areas (onsite);</li> <li>2. Establishing Plummer's mariposa lily and slender mariposa lily plants outside the project areas (offsite); or</li> <li>3. Purchase of credits and/or mitigation lands at a ratio above 1:1 from an entity reviewed and approved by the USFWS and/or CDFG. Details of the restoration plan will be pending consultation between SCE, USFWS, and CDFG. For Options 1 and 2, (establishing Plummer's mariposa lily and slender mariposa lily plants onsite or off-site), the plan will include the following elements: planting/seeding palettes; monitoring and contingency program; monitoring schedule, including duration and performance criteria</li> </ol>		

**Exhibit A-1: Revised Table ES-1 and 7-1**

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) (a minimum of 80 percent successful plant establishment after a minimum of three years); and any specific measures that will be required to ensure success of the restoration effort.	Monitoring Requirements	Timing
Impact	<p><b>MM BR-11: Non-Native and Invasive Plant Species.</b> The applicant and SCE will avoid and reduce the spread of non-native and invasive plant species in the proposed project component areas through the following actions:</p> <ol style="list-style-type: none"> <li>1. All equipment brought in from offsite that could transport soils, seeds, or other plant propagules (i.e., seeds, spores, tubers, or stems that can reproduce the plant) will be washed at a containment area to prevent introduction of unwanted plant material to the proposed project component areas;</li> <li>2. All construction vehicles or equipment operating within the proposed project component areas in areas known to have noxious or invasive weeds will similarly be clean of any soils or plant materials before transport or re-deployment elsewhere within the proposed project component areas to prevent transferring weeds;</li> <li>3. All soils, gravel, imported fill, or other construction materials brought from offsite that could inadvertently contain unwanted plant propagules will come from confirmed weed-free sources;</li> <li>4. All seeds to be used in revegetation and reclamation activities will come from onsite, or from certified weed-free sources; and</li> <li>5. All temporary disturbance areas, including access roads, transmission line corridors, and towers would be monitored on a quarterly basis for one year after project construction is completed for invasive species establishment, and weed control measures will be initiated immediately upon evidence of invasive species introduction.</li> </ol>		
Impact BR-2: Substantial adverse effect on riparian habitat or other sensitive natural community.	<p><b>Riparian Habitat</b>  <b>APM AQ-3: Minimization of Disturbed Areas.</b> See above.  <b>APM BR-2: Designated Work Zones and Sensitive Resource Avoidance.</b> See above.  <b>APM BR-3: Post-construction Restoration for Reconductoring.</b> See above.  <b>APM BR-5: Exclusionary Fencing.</b> See above.</p>	<p>Ensure that the applicant and SCE survey for riparian zones within the storage field, the 66 kV subtransmission line routes, and Telecommunications Route#2 as specified in MM BR-12. Ensure that SCE surveyed Telecommunications Route #2 for individual oak trees as specified in MM BR-13. See above/below for APMs BR1 through BR-8;</p>	<p>Prior to, during, and after construction</p>

**Exhibit A-1: Revised Table ES-1 and 7-1**

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
<p><b>APM GE-3:</b> Erosion and Sediment Control. See below.</p> <p><b>APM HZ-6:</b> Worker Environmental Awareness Training. See below.</p> <p><b>MM BR-1:</b> Trimming of Vegetation. See above.</p> <p><b>MM BR-5:</b> Impacts on Hydrologic Features. See above.</p> <p><b>MM BR-12:</b> Minimize Impact on Riparian Habitat. The applicant and SCE will complete the following: 1. A qualified ecologist will survey and determine the spatial extent of riparian zones in the areas of the storage field, the 66-kV subtransmission line; and Telecommunications Route #2; 2. Where riparian vegetation would be impacted by project construction activities, the applicant and SCE will consult with CDFG to determine if a Lake and Streambed Alteration Agreement pursuant to California Fish and Game Code 1600 would be necessary; and 3. In those areas where riparian vegetation is required to be removed, the applicant and SCE will work with a qualified arborist to determine the minimum amount of vegetation required to be removed in order to accommodate project construction; and the correct trimming procedures to employ.</p> <p><b>Sensitive Natural Communities</b></p> <p><b>APMs BR-1 through BR-8.</b> See above.</p> <p><b>APM AQ-3:</b> Minimization of Disturbed Areas. See above.</p> <p><b>MMs BR-1 through BR-10 and MM BR-12.</b> See above.</p> <p><b>MM BR-13:</b> Oak Trees in the Vicinity of Telecommunications Route #2. Prior to construction, SCE will survey the area of Telecommunications Route #2 for individual oak trees that meet the criteria for protection under the Los Angeles County ordinance. All oak trees whose trunks measure 25 inches or more in circumference (8 inches in diameter) will not be removed, nor will ground compaction occur within a 10-foot radius from the drip line of any oak tree that meets this criterion. Impacts on all oak trees within the area of disturbance for Telecommunications Route #2 beyond minor trimming will be avoided and minimized (i.e., no more than 25 percent of any individual oak tree canopy will be trimmed during one growing season). In the event that impacts on oak trees meeting the above criterion cannot be avoided or minimized, the applicant will provide oak tree seedling replacement at a 2:1 ratio, pending consultation with Los Angeles County.</p>	<p>APMs AQ-3, GE-3, and HZ-6; and MMs BR-1 through BR-10. See additional requirements for MM BR-12 and MM BR-13.</p>		

**Exhibit A-1: Revised Table ES-1 and 7-1**

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
<i>Impact BR-3: Substantial adverse effect on federally protected wetlands.</i>	APM AQ-3: Minimization of Disturbed Areas. See above. APM BR-2: Designated Work Zones and Sensitive Resource Avoidance. See above. APM GE-3: Erosion and Sediment Control. See below. MM BR-5: Impacts on Hydrologic Features. See above.	See above/below.	See above/below.
<i>Impact BR-4: Substantial interference with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impedence of the use of native wildlife nursery sites.</i>	APM BR-2: Designated Work Zones and Sensitive Resource Avoidance. See above.	See above.	See above.
<i>Impact BR-5: Conflict with local policy and ordinance protecting oak trees.</i>	APM AQ-3: Minimization of Disturbed Areas. See above. APM AQ-4: Watering Prior to Grading and Excavation. See above. APM BR-3: Oak Tree Impact Avoidance. See above.	See above.	See above.
<b>4.5 Cultural Resources</b>			
<i>Impact CR-1: Substantial adverse change in the significance of an historical resource.</i>	APM CR-1: Conductor Pull and Tension Sites. SCE will ensure that, where feasible, conductor pull and tension sites are located on existing level areas and existing roads to minimize the need for grading and cleanup. APM CR-2: Unidentified Cultural Resources. The applicant and SCE will ensure that, if previously unidentified cultural resources are unearthed during construction activities, construction will be halted in that area and directed away from the discovery until a qualified archaeologist assesses the significance of the resource. If determined to be required by the archaeologist, the archaeologist will evaluate the significance of the discovered resources based on eligibility for the California Register of Historical Resources (CRHR) or local registers. Should any cultural resources be identified during construction activities in all project areas (including but not limited to culturally sensitive areas), the applicant and SCE will ensure that qualified archaeologists will monitor cultural resources mitigation and ground-disturbing activities in the area of the find. The size of the area of the find will be determined by the archaeologist. The archaeologist will recommend appropriate measures to record, preserve, or recover the resources. Preliminary recommendations of CRHR eligibility made by the archaeologist will be reviewed by	Ensure that cultural surveys are completed after final siting for SCE project components and that qualified cultural resources consultants and archaeologists are retained by the applicant and SCE (APM CR-4, MM CR1, and MM CR-2). Confirm that Cultural Resources Plans were prepared by the applicant and SCE per MM CR1 requirements. See additional requirements for APMs CR-1, CR-2, and CR-4 and MM CR-4. See requirements for APM HZ-65, below. Ensure that final inspection is completed after project components are constructed (MM CR-5).	Prior to, during, and after construction

Exhibit A-1: Revised Table ES-1 and 7-1

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
Impact	<p>the CPUC.</p> <p><b>MM CR-4: Stop Work for Unanticipated Cultural Resources Discoveries.</b> In the event that previously unidentified cultural resources are uncovered during implementation of the project, the applicant and SCE will ensure that ground-disturbing work would be halted or diverted away from the discovery to another location. The CPUC staff approved archeological <del>monitor</del> <b>contractor</b> will inspect <b>and</b> review the discovery and determine whether further investigation is required. If the discovery is significant but can be avoided and no further impacts would occur, the resource would be documented appropriately and no further effort would be required. If the resource is significant but cannot be avoided and may be subject to further impact, the CPUC-approved archeological monitor would evaluate the significance of the resource based on eligibility for the California Register of Historical Resources (CRHR) or local registers and implement appropriate measures in accordance with the Cultural Resources Plans.</p> <p><b>APM HZ-65: Worker Environmental Awareness Training.</b> See below.</p> <p><b>MM CR-1: Cultural Resources Plan.</b> The applicant and SCE will retain the services of qualified cultural resources consultants who meet or exceed the U.S. Secretary of the Interior qualification standards for archaeologists published in 36 Code of Federal Regulations 61 and have experience working in the jurisdictions traversed by the project, sufficient that they can identify the full range of cultural resources that may be found in the region. The consultants will also have knowledge of the cultural history of the project area and will be approved by the California Public Utilities Commission (CPUC).</p> <p>Prior to issuance of construction permits, the applicant and SCE will submit Archaeological Monitoring and Treatment <del>Cultural Resources Plans</del> <b>Cultural Resources</b> for review and approval by the CPUC staff. The intent of the <del>consultant</del> <b>Cultural Resources</b> Plans will be to address cultural resources eligible for the CRHR that cannot be preserved by avoidance and to identify areas where monitoring of earth-disturbing activities is required. The monitoring plan shall include, at a minimum:</p> <ul style="list-style-type: none"> <li>• A list of personnel to which the plan applies; Requirements, as necessary, and plans for continued Native American involvement and outreach, including participation of Native American monitors during ground-disturbing activities as determined appropriate;</li> <li>• Brief identification and description of the general range of the resources that may be encountered; Identification of the elements of a site that</li> </ul>		

Exhibit A-1: Revised Table ES-1 and 7-1

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) would lead to it meeting the definition of a cultural resource requiring protection and mitigation:	Monitoring Requirements	Timing
	<p>• Identification and description of resource mitigation that would be undertaken if required;</p> <p>• Description of monitoring procedures that will take place for each project component area as required;</p> <p>• Description of how often monitoring will occur (e.g., full-time, part time, spot checking);</p> <p>• Description of the circumstances that would result in the halting of work;</p> <p>• Description of the procedures for halting work and notification procedures for construction crews;</p> <p>• Testing and evaluation procedures for resources encountered;</p> <p>• Reporting procedures; and</p> <p>• Contact information for those to be notified or reported to.</p> <p><b>MM CR-2: Additional Cultural Resources Surveys.</b> Prior to issuance of construction permits, the applicant and SCE will ensure that retain qualified archaeological consultants contractor(s), as specified in the <del>Cultural Resources</del> <del>Plan-Archaeological Monitoring and Treatment Plan-#44</del> to conduct intensive-level cultural resources surveys (transects no greater than 15 meters) for all areas to be disturbed that have not already been surveyed for cultural resources and, prior to the project, had previously been undisturbed. Reports that specify the research design, methods, and survey results will be submitted to the CPUC for review. Cultural resources surveys for areas along Telecommunications Route #3 that are located more than 600 feet east of San Fernando Substation will not be required, because these areas are located within residential neighborhoods and are disturbed areas.</p> <p><b>MM CR-3: Construction Monitoring.</b> Prior to issuance of grading permit(s), the applicant and SCE will retain qualified archaeologists as specified in the Cultural Resources Plans to monitor cultural resources mitigation and ground disturbing activities in culturally sensitive areas. Culturally sensitive areas would include those areas along the 66-kV subtransmission line reconductoring routes and Telecommunications Route #3 and within the storage field that have not previously been disturbed. Cultural resources monitoring for areas along Telecommunications Route #3 that are located more than 600 feet east of San Fernando Substation will not be required because these areas are located within residential neighborhoods</p>		

Exhibit A-1: Revised Table ES-1 and 7-1

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) and are disturbed areas. The qualified archaeologists will attend preconstruction meetings to provide comments and/or suggestions concerning monitoring plans and discuss excavation plans with excavation contractors. <b>MM CR-4: Stop Work for Unanticipated Cultural Resources Discoveries.</b> In the event that previously unidentified cultural resources are uncovered during implementation of the project, the applicant and SCE will ensure that ground disturbing work would be halted or diverted away from the discovery to another location. The CPUC-approved archeological monitor will inspect the discovery and determine whether further investigation is required. If the discovery is significant but can be avoided and no further impacts would occur, the resource would be documented appropriately and no further effort would be required. If the resource is significant but cannot be avoided and may be subject to further impact, the CPUC-staff approved archaeologist-monitors would evaluate the significance of the resource based on eligibility for the California Register of Historical Resources (CRHR) or local registers and implement appropriate measures in accordance with the <b>Archaeological Monitoring and Treatment Cultural Resources Plans</b> . <b>MM CR-5: Cultural Resources Reporting.</b> Prior to final inspection after construction of project components has been completed, the applicant's and SCE's qualified archaeologists as specified in the <b>Cultural Resources Archaeological Monitoring and Treatment Plans</b> will submit reports to the CPUC summarizing all monitoring and mitigation activities and confirming that all mitigation measures have been implemented. If a cultural resource that meets the definition of a significant resource is encountered and data recovery is necessary, then a data recovery program will be implemented for the resource that is approved by both the qualified archeologist/s and the CPUC.	Monitoring Requirements	Timing
<i>Impact CR-2: Substantial adverse change in the significance of an archaeological resource.</i>	See Impact CR-1, above.	See Impact CR-1, above.	See Impact CR-1, above.
<i>Impact CR-3: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.</i>	<b>MM CR-6: Paleontological Monitoring and Treatment Plan.</b> Prior to construction permit issuance, the applicant and SCE will retain CPUC-approved paleontologists to prepare Paleontological Monitoring and Treatment Plans and submit to the CPUC for review and approval. The CPUC-approved paleontologists will have knowledge of the local paleontology and be familiar with paleontological procedures and techniques. The Paleontological Monitoring and Treatment Plans will follow	Ensure that CPUC-approved paleontologists are retained by the applicant and SCE (MM CR-6). Confirm that Paleontological Monitoring and Treatment Plans were prepared by the applicant and SCE per MM CR-6 requirements. Confirm that applicant and SCE construction personnel are	Prior to, during, and after construction

**Exhibit A-1: Revised Table ES-1 and 7-1**

Impact	<p><b>Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)</b></p> <p>Society of Vertebrate Paleontology guidelines and meet all regulatory requirements. The Paleontological Monitoring and Treatment Plans will address the 66-kV subtransmission line reconductoring routes, Telecommunications route #2, and Telecommunications Route #3, Natural Substation, guardhouse, and entry road widening sites. The Paleontological Monitoring and Treatment Plans will identify construction impact areas of moderate to high sensitivity for encountering potential paleontological resources and the shallowest depths at which those resources may be encountered. The Paleontological Monitoring and Treatment Plans will detail the criteria to be used to determine whether an encountered resource is significant and if it should be avoided or recovered for its data potential. The Paleontological Monitoring and Treatment Plans will also detail methods of recovery, preparation and analysis of specimens, final curation of specimens at a federally accredited repository, data analysis, and reporting. The Paleontological Monitoring and Treatment Plans will outline coordination strategies to ensure that CPUC-approved paleontological monitors will conduct full-time monitoring of all grading activities in sediments determined to have a moderate to high sensitivity. For sediments of low or undetermined sensitivity, the Paleontological Monitoring and Treatment Plans will specify what level of monitoring is necessary. Sediments with no sensitivity will not require paleontological monitoring. The Paleontological Monitoring and Treatment Plans will define specific conditions in which monitoring of earthwork activities could be reduced and/or depth criteria established to trigger monitoring. These factors will be defined by the CPUC-approved paleontologists.</p> <p><b>APM HZ-5: Worker Environmental Awareness Training.</b> See below.</p> <p><b>MM CR-7: Construction Personnel Training.</b> Prior to the initiation of construction or ground-disturbing activities in areas with high paleontological sensitivity, the applicant and SCE shall ensure that all construction personnel conducting rough grading shall be trained regarding the recognition of possible subsurface paleontological resources and protection of all paleontological resources during construction grading. The applicant and SCE will complete training for all applicable personnel. Training will inform all applicable personnel of the procedures to be followed upon the discovery of paleontological resources. All personnel will be instructed that unauthorized collection or disturbance of protected fossils on or off-site by the applicant or SCE or their representatives or employees is illegal and that violators shall be subject to prosecution under appropriate federal and state laws. Unauthorized resource collection or disturbance may constitute grounds for the</p>	<p><b>Monitoring Requirements</b></p> <p>trained per MM CR-7 requirements. See additional requirements for MM CR-6 through MM CR-10.</p>	Timing
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Exhibit A-1: Revised Table ES-1 and 7-1

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) <i>Issuance of a stop-work order:</i> <b>MM CR-87: Paleontology Construction Monitoring.</b> Based on the Paleontological Monitoring and Treatment Plans, the applicant and SCE will conduct paleontological monitoring using CPUC staff approved paleontological monitors/contractors. This will include monitoring during rough grading and trenching in areas determined to have high paleontological sensitivity and that have the potential to be shallow enough to be adversely affected by such earthwork as determined by the CPUC-staff approved paleontological monitors/Paleontological Monitoring and Treatment Plans. <b>MM CR-88: Stop Work for Unanticipated Paleontological Discoveries.</b> In the event that previously unidentified paleontological resources are uncovered during implementation of the project, the applicant and SCE will ensure that ground-disturbing work would be halted or diverted away from the discovery to another location. A CPUC-approved paleontological monitor would inspect the discovery and determine whether further investigation is required. If the discovery is significant but can be avoided and no further impacts would occur, the resource would be documented in the appropriate paleontological resource records and no further effort would be required. If the resource is significant but cannot be avoided and may be subject to further impact, the CPUC-approved paleontological monitor would evaluate the significance of the resource and implement appropriate measures in accordance with the Paleontological Monitoring and Treatment Plans. <b>MM CR-409: Paleontological Data Recovery.</b> Prior to final inspection after construction of project components has been completed, if avoidance of significant paleontological resources is not feasible during grading, treatment (including recovery, specimen preparation, data analysis, curation, and reporting) will be carried out by the applicant and SCE in accordance with the approved Paleontological Monitoring and Treatment Plans.	Monitoring Requirements	Timing
<b>Impact CR-4: Disturb any human remains, including those interred outside of formal cemeteries</b>	<b>APM CR-3: Human Remains.</b> The applicant and SCE will ensure that, if human remains are encountered during construction or any other phase of development, work will be halted in the area and directed away from the discovery. The County Coroner will be notified within 24 hours of the discovery. No further disturbance will occur until the County Coroner makes the necessary findings of origin and disposition pursuant to Public Resources Code 5097.98-99, Health and Safety Code 7050.5. If the coroner determines that the burial is not historic, but prehistoric,	Ensure that cultural surveys are completed after final siting for SCE project components and that qualified cultural resources consultants and archaeologists are retained by the applicant and SCE (APIW CR-4, MM CR1, and MM CR-2). Confirm that Cultural Resources Plans were prepared by the applicant and SCE per MM CR1 requirements. See additional	Prior to, during, and after construction

**Exhibit A-1: Revised Table ES-1 and 7-1**

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) the Native American Heritage Commission (NAHC) will be contacted to determine the most likely descendant (MLD) for this area. The MLD may become involved with the disposition of the burial following scientific analysis. If the remains are determined to be Native American, the Native American Heritage Commission will be notified within 24 hours as required by Public Resources Code 5097. The CPUC will mediate any disputes regarding treatment of remains. APM CR-4: Cultural Surveys After Final Project Siting. See above. MM CR-1: Cultural Resources Plan. See above. MM CR-2: Additional Cultural Resources Surveys. See above. MM CR-3: Construction Monitoring. See above. MM CR-4: Stop Work for Unanticipated Cultural Resources Discoveries. See above. MM CR-5: Cultural Resources Reporting. See above. MM CR-409: Paleontological Data Recovery. Prior. See above.	Monitoring Requirements requirements for APMs CR-3 and CR-4. MMs CR-1 through CR-6, and MM CR-10. Ensure that final inspection is completed after project components are constructed (MM CR-5).	Timing
4.6 Geology, Soils, and Mineral Resources  <i>Impact GE-1: Expose people or structures to risk of loss, injury, or death involving rupture of a known earthquake fault.</i>	<b>APM GE-1: Geotechnical Studies.</b> The applicant will ensure that, for the construction of the Central Compressor Station, construction procedures will be conducted as discussed in the recommendations section of the Preliminary Geotechnical Investigation Report prepared by Globus (2006) to avoid impacts related to unstable geologic conditions. In addition, pre-engineering geotechnical studies will be completed by the applicant and SCE for the proposed Natural Substation and select TSP locations prior to construction. The pre-engineering geotechnical studies will evaluate the depth to the water table, document evidence of faulting; and determine liquefaction potential, physical properties of subsurface soil, soil resistivity, slope stability, and the presence of hazardous materials. The applicant and SCE will further ensure that, for the construction of the Natural Substation and select TSP locations, construction procedures will be conducted as discussed in the recommendations section of the geotechnical studies report.	Ensure that pre-engineering geotechnical studies are completed by the applicant and SCE (APM GE-1). See additional requirements for APM GE-1.	Prior to and during construction

Exhibit A-1: Revised Table ES-1 and 7-1

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
Impact GE-2: Expose people or structures to the risk of loss, injury, or death involving strong seismic ground shaking.	<p>APM GE-1: Geotechnical Studies. See above.</p> <p>APM GE-2: Seismic-resistant Design Measures. The applicant and SCE will ensure that the proposed project components are designed in accordance with CPGC General Orders and to meet applicable seismic safety standards of the California Building Code and Uniform Building Code standards for Seismic Risk Zone IV. Specific design measures may include, but are not limited to, special foundation design and additional bracing and support of upright facilities. Project facilities and foundations will be designed to withstand changes in soil density. The proposed Natural Substation will be designed consistent with the Institute of Electrical and Electronics Engineers 693 standard, Recommended Practices for Seismic Design of Substations.</p>	Ensure that pre-engineering geotechnical studies are completed by the applicant and SCE (APM GE-1).	Prior to and during construction
Impact GE-3: Expose people or structures to the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.	See Impact GE-2, above.	See Impact GE-2, above.	See Impact GE-2, above.
Impact GE-4: Expose people or structures to the risk of loss, injury, or death involving landslides.	See Impact GE-2, above.	See Impact GE-2, above.	See Impact GE-2, above.
Impact GE-5: Result in substantial soil erosion or the loss of topsoil.	<p>APM AQ-3: Minimization of Disturbed Areas. See above. APM GE-3: Erosion and Sediment Control. The applicant and SCE will ensure that erosion and sediment control measures will be implemented in each of the project component areas during construction activities to reduce the amount of soil displaced and transported to other areas by storm water, wind, or other natural forces. To minimize site disturbance, the applicant and SCE or their respective construction contractors will: Remove only the vegetation that is absolutely necessary to remove (e.g., trim or mow instead of grub where feasible); Avoid off-road vehicle use outside work zones; and Instruct all construction personnel on storm water pollution prevention concepts to ensure they are conscious of how their actions affect the potential for erosion and sedimentation.</p> <p>MM BR-5: Impacts on Hydrologic Features. See above.</p>	Ensure that the applicant and SCE complete formal delineations per USACE protocols and consult with CDFG and USACE as specified in MM BR-5. See requirements for APMs AQ-3, GE-3, and MM BR-5.	Prior to and during construction

Exhibit A-1: Revised Table ES-1 and 7-1

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
<i>Impact GE-6: Located on a geologic unit or soil that is or would become unstable and result in on-or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.</i>	APM GE-1: Geotechnical Studies. See above.	See above.	See above.
<i>Impact GE-7: Located on expansive soil.</i>	APM GE-2: Seismic-resistant Design Measures. See above.	See above.	See above.
4.7 Greenhouse Gases			
<i>Impact GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.</i>	APM AQ-1: Maintain Engines in Good Working Condition. See above. APM AQ-2: Minimization of Equipment Use. See above. APM GHG-1: Engine Maintenance. The applicant and SCE will ensure that construction and operations vehicle equipment engines are maintained in good condition and in proper tune according to manufacturer specifications. APM GHG-2: Scheduling. The applicant and SCE will ensure that staff and daily construction activities for each of the project components are efficiently scheduled to minimize the use of unnecessary/duplicate equipment when possible.	See requirements for APMs AQ-1, AQ-2, GHG-1, and GHG-2.	During construction
4.8 Hazards and Hazardous Materials			
<i>Impact HZ-1: Significant hazard from routine transport, use, or disposal of hazardous materials.</i>	APM HZ-32: Hazardous Materials Spill and Release Prevention. The applicant and SCE will ensure that construction procedures are implemented to minimize the potential for hazardous material spills and releases in each of the project component areas. APM HZ-54: Hazardous Materials Use and Storage and Hazardous Waste. The applicant and SCE will ensure the following during construction of the proposed project components: All hazardous materials (including fuels, lubricants, and cleaning solvents) will be stored, handled, and used in accordance with applicable regulations. For all hazardous materials in use at construction sites, Material Safety Data Sheets will be available for routine or emergency use. In addition, the applicant will ensure the following for the storage field project components during construction: All hazardous materials planned for use or storage at the storage field site during construction of the proposed Central Compressor Station will be preapproved by the applicant's designated safety staff. Approval of hazardous materials will be determined only after full review of the Material Safety Data Sheet	Ensure that the applicant and SCE implement a Worker Environmental Awareness Training program as specified in APM HZ-65. See additional requirements for APMs HZ-32, HZ-54, HZ-65, and HZ-76.	Prior to and during construction

Exhibit A-1: Revised Table ES-1 and 7-1

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) for the proposed material. Hazardous materials storage locations at the storage field will be determined based on the storm water pollution prevention plan and storage field policy. Existing materials are stored within the storage field's hazardous material and hazardous waste storage area. The applicant and SCE will also ensure the following during operation of the proposed project components: All hazardous and nonhazardous wastes generated during operation of the proposed project (e.g., waste oil and gas condensates from the compressor station) will be classified and managed in accordance with federal and state regulations and site-specific permits. All hazardous materials (including fuels, lubricants, and cleaning solvents) will be stored, handled, and used in accordance with applicable regulations.	Monitoring Requirements	Timing
Impact	<p><b>APM HZ-65: Worker Environmental Awareness Training.</b> Prior to construction, the applicant and SCE will develop and implement Worker Environmental Awareness Training Programs based on the final engineering design, the results of preconstruction surveys, and a list of mitigation measures developed by the CPUC to mitigate significant environmental effects of the proposed project. Prior to start of work, presentations will be prepared by the applicant and SCE and shown to all workers who will be present on the proposed project component sites during construction. A record of all trained personnel (including logs of training sessions signed by all workers who attended each session) will be kept with the construction foreman. The CPUC will conduct regular (monthly and random) audits to ensure that workers on the project component sites have received the appropriate training. Audits will include worker tests and/or interviews to confirm adequate instruction in construction procedures and mitigation measures. All construction personnel will receive the following:</p> <ol style="list-style-type: none"> <li>1. Instruction for compliance with project component site-specific biological or cultural resource protective measures and mitigation measures that are developed after preconstruction surveys;</li> <li>2. A list of phone numbers for key personnel associated with the proposed project including the archeological and biological monitors, environmental compliance coordinator, and regional spill response coordinator;</li> <li>3. Instruction on the South Coast Air Quality Management District Fugitive Dust and Ozone Precursor Control Measures and Portable Engine Operating Parameters;</li> </ol>		

**Exhibit A-1: Revised Table ES-1 and 7-1**

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
Impact HZ-2: Significant hazard from accident conditions involving the release of hazardous materials.	<p>4. Direction that site vehicles must be properly muffled;</p> <p>5. Instruction on what typical cultural resources look like, and instruction that if cultural resources are discovered during construction, to suspend work in the vicinity of the find and contact the site supervisor and archeologist or environmental compliance coordinator;</p> <p>6. Instruction on how to work near any Environmentally Sensitive Areas delineated by archeologists or biologists;</p> <p>7. Instruction on individual responsibilities under the Clean Water Act, the applicant's and SCE's storm water pollution prevention plans, site-specific best management practices, hazardous materials and waste management requirements, and the location of Material Safety Data Sheets as needed for each proposed project component;</p> <p>8. Instructions to notify the site supervisor and regional spill response coordinator in the event of hazardous materials spills or leaks from equipment or upon the discovery of soil or groundwater contamination;</p> <p>9. A copy of the truck routes to be used for material delivery; and</p> <p>10. 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 components.</p> <p><b>APM HZ-76: Wood Pole Recycling and Disposal.</b> SCE will ensure that utility pole and other utility wood waste is reused by SCE, returned to the manufacturer, disposed of in a Class I hazardous waste landfill, or disposed of in the lined portion of a municipal landfill certified by the associated Regional Water Quality Control Board.</p> <p><b>APM HZ-42: Hazardous Materials Spill and Release Prevention.</b> See above.</p> <p><b>APM HZ-43: Contaminated Soil Disposal.</b> The applicant and SCE will ensure that any soil from excavation and grading activities that is suspected of being contaminated with oil or other hazardous materials is characterized and disposed offsite at an appropriately licensed waste facility.</p> <p><b>APM HZ-54: Hazardous Materials Use and Storage and Hazardous Waste.</b> See above.</p> <p><b>APM HZ-65: Worker Environmental Awareness Training.</b> See above.</p>	<p>Ensure that the applicant prepares a Soil Sampling and Contaminated Soils Contingency Plan as specified in MM HZ-1. Ensure that the applicant and SCE implement a Worker Environmental Awareness Training program as specified in APM HZ-65. See additional requirements for APMs HZ-3, HZ-4, HZ-5, and HZ-6 and MM HZ-1.</p>	<p>Prior to and during construction</p>

Exhibit A-1: Revised Table ES-1 and 7-1

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p><b>MM HZ-1: Soil Sampling and Contaminated Soils Contingency Plan.</b> The applicant will prepare a Soil Sampling and Contaminated Soils Contingency Plan that would outline procedures for testing soils in locations where contaminated soils are suspected to be present including the office building and Central Compressor Station site locations. The Soil Sampling and Contaminated Soils Contingency Plan will also outline the steps that would be implemented if contaminated soils are encountered during pre-construction soil sampling and testing or if they are encountered at any point during construction. Provisions outlined in this plan would include phone numbers of city, county, state, and federal agencies and primary, secondary, and final cleanup procedures. In addition, the plan would address health and safety procedures to minimize environmental impacts in the event that hazardous soils or other materials are encountered during construction of the project, including measures such as worker training, containerization and storage, and monitoring. The plan would also establish security measures to prevent unauthorized entry to cleanup sites and to reduce hazards outside the investigation/cleanup area and would identify appropriate, licensed disposal facilities, and haulers.</p>		
Impact HZ-3: Emit hazardous emissions or involve handling hazardous materials, substances, or waste within one-quarter miles of an existing or proposed school.	<p><b>APM HZ-32: Hazardous Materials Spill and Release Prevention.</b> See above.  <b>APM HZ-54: Hazardous Materials Use and Storage and Hazardous Waste.</b> See above.  <b>APM HZ-55: Worker Environmental Awareness Training.</b> See above.</p>	See above.	See above.
Impact HZ-4: Be located on a site that is included on a list of hazardous materials sites.	<p><b>MM HZ-1: Soil Sampling and Contaminated Soils Contingency Plan.</b> See above.</p>	See above.	See above.
Impact HZ-5: Safety hazards for people residing or working in the project component areas that are within the area of an airport land use plan or within two miles of an airport.	<p><b>APM HZ-1: Federal Aviation Administration Consultation.</b> SCE will consult with the Federal Aviation Administration as part of the design phase for the SCE proposed project components to ensure that elevated structures such as TSPs will not pose a hazard for air traffic.</p>	See requirements for APM HZ-1.	Prior to construction
Impact HZ-6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	<p><b>APM HZ-87: Construction Fire Control and Emergency Response Measures.</b> To address the risk of fire during construction of the proposed project components, the applicant and SCE will develop fire control and emergency response measures as part of the Construction Safety and Emergency Response Plans developed in</p>	Ensure that the applicant and SCE develop Construction Safety and Emergency Response Plans as specified in APM HZ-87. See additional requirements for APM HZ-87.	Prior to construction

**Exhibit A-1: Revised Table ES-1 and 7-1**

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) consultation with their contractors for use during construction of the proposed project components. The Construction Fire Control and Emergency Response Measures will describe fire prevention and response practices that the applicant and SCE will implement during construction of the proposed project components to minimize the risk of fire, and in the case of fire, provide for immediate suppression and notification. SCE's Construction Fire Control and Emergency Response Measures will also be generally consistent with SCE's Specification E-2005-104, Transmission Line Project Fire Plan (February 21, 2006). The Construction Fire Control and Emergency Response Measures shall specify that the applicant and SCE, or the respective construction contractors, shall furnish all supervision, labor, tools, equipment, and material necessary to prevent starting any fire, control the spread of fires if started, and provide assistance for extinguishing fires started as a result of project construction activities. Labor shall include the assignment of Fire Risk Managers who will be present at each proposed project component area during construction activities, whose sole responsibility will be to monitor the contractor's fire-prevention activities, and who will have full authority to stop construction in order to prevent fire hazards.	Monitoring Requirements	Timing
	<p>1. The Fire Risk Managers shall: Be responsible for preventing, detecting, controlling, and extinguishing fires set accidentally as a result of construction activity; Review the Fire Control and Emergency Response Measures with the fire patrolperson and construction employees prior to starting work at each project area; Ensure that all construction personnel are trained in fire safety measures relevant to their responsibilities. At a minimum, construction personnel shall be trained and equipped to extinguish small fires; Be equipped with radio or cell phone communication capability; and Maintain an updated a key personnel and emergency services contact (telephone and email) list, kept onsite and made available as needed to construction personnel.</p> <p>2. Equipment shall include:</p> <ul style="list-style-type: none"> <li>a. Spark arresters that are in good working order and meet applicable regulatory standards for all diesel and gasoline internal combustion engines, stationary and mobile;</li> <li>b. One shovel and one pressurized chemical fire extinguisher for each gasoline-powered tool, including but not restricted to compressors, hydraulic accumulators, gardening tools (such as chain saws and weed trimmers), soil</li> </ul>		



**Exhibit A-1: Revised Table ES-1 and 7-1**

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>augers, rock drills, etc.;</p> <p>c. Fire suppression equipment to be kept on all vehicles used for project construction; and</p> <p><del>d. An onboard self-extinguishing fire suppression system capable of extinguishing any equipment-caused fire to be kept on heavy construction operating equipment.</del></p> <p>3. Measures to be undertaken by the applicant, SCE or the respective construction contractors, and monitored and enforced by the Fire Risk Manager, at each of the project areas during construction activities, shall include:</p> <p>a. The installation of fire extinguishers at the proposed Central Compressor Station site;</p> <p>b. The prohibition of smoking at each construction job site as follows: no smoking in wildland areas; no smoking during operation of light or heavy equipment; limit smoking to paved areas or areas cleared of all vegetation; no smoking within 30 feet of any area in which combustible materials (including fuels, gases, and solvents) are stored; no smoking in any project construction areas during any Red Flag Warnings that apply to the area;</p> <p>c. The posting of no smoking signs and fire rules on the project bulletin board at all contractor field offices and areas visible to employees during fire season;</p> <p>d. The maintenance of all construction areas in an orderly, safe, and clean manner. All oily rags and used oil filters shall be removed from project construction areas. After construction activities are completed in each project area, the area shall be cleaned of all trash and surplus materials. All extraneous flammable materials shall be cleared from equipment staging areas and parking areas;</p> <p>e. Confinement of welding activities to cleared areas having a minimum radius of 10 feet measured from place of welding, and observed by the Fire Risk Manager;</p> <p>f. Prevention of the idling of vehicles with hot exhaust manifolds on dirt roads with dead combustible vegetation under the vehicle;</p> <p>g. The provision of portable communication devices (i.e., radio or mobile telephones) as needed to construction personnel and communication protocols for onsite workers to coordinate with local agencies and emergency personnel in the event of fire or other emergencies during construction or operation of the</p>		

Exhibit A-1: Revised Table ES-1 and 7-1

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
Impact HZ-7: Expose people or structures to a significant risk involving wildland fires.	<p>proposed project, and</p> <p>h. Any additional measures as needed during construction to address fire prevention and detection, to lower the risk of wildland fires.</p> <p>4. Measures will also include the following requirements that would involve coordination between the applicant and SCE, and the Fire Departments and CAL FIRE:</p> <p>a. The applicant and SCE or the respective construction contractors shall furnish any and all forces and equipment to extinguish any uncontrolled fire near the project component areas as directed by Fire Department or CAL FIRE representatives;</p> <p>b. The applicant and SCE or the respective construction contractors shall abide by all restrictions to construction activity that may be enforced by the Fire Departments and/or CAL FIRE during Red Flag Warning days; and</p> <p>c. In the event that the applicant and SCE or the respective construction contractors sets fire to incinerate cleared vegetation.... The application will not burn cleared vegetation during construction activities</p> <p>5. Measures will also include additional special provisions for days when the National Weather Service issues a Red Flag Warning. Standard protocols implemented during these periods will include:</p> <p>a. Measures to address storage and parking areas;</p> <p>b. Measures to address the use of gasoline-powered tools;</p> <p>c. Procedures for road closures as necessary;</p> <p>d. Procedures for use of a fire guard as necessary; and</p> <p>e. Additional fire suppression tools and fire suppression equipment, and training requirements.</p> <p>APM HZ-2: Plant Power Line Inspection and Maintenance. After construction, the applicant will inspect and maintain the Plant Power Line on at least a monthly basis for the purpose of reducing wildfire hazards.</p> <p>APM HZ-87: Construction Safety and Emergency Response Plan. See above.</p> <p>MM HZ-2: Fire Department Review and Coordination. Prior to construction of the proposed project components, the applicant and SCE will coordinate with CAL FIRE, the City of Los Angeles Fire Department, and the Los Angeles County and</p>	<p>Confirm that the applicant and SCE coordinated with the Los Angeles County and Ventura County Fire Departments as specified in MM HZ-2. Ensure that the applicant and SCE develop Construction Safety and Emergency Response Plans as specified in APM HZ-87. See additional requirements for APMs HZ-2 and HZ-87 and MM HZ-2.</p>	<p>Prior to, during, and after construction and during operations</p>

**Exhibit A-1: Revised Table ES-1 and 7-1**

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Ventura County Fire Departments (Fire Departments) according to the location of the proposed project components, to the satisfaction of the lead agency. The applicant and SCE will submit the following materials ("fire management information") for review by the Fire Departments: proposed project components and design, specific construction methods and equipment, and a description of plans and measures including but not limited to the applicant's Fire/Emergency Action Plan, SCE's Fire Management Plan, the applicant's and SCE's Construction Safety and Emergency Response Plans, and measures that would be undertaken by the applicant and SCE to further address risks involving wildland fires during construction and operation of the proposed project components (including Fire Control and Emergency Response Measures). The Fire Departments will review the applicant and SCE's fire management information prior to construction of the proposed project components. The applicant and SCE will also submit the fire management information along with a record of contacts and coordination with the Fire Departments to the CPUC, for review and approval prior to construction of the proposed project components. The applicant will also submit any revisions of the facility Fire/Emergency Action Plan related to operation of the Central Compressor Station, for the same level of review and approval, prior to the start of project operations at the storage field.	Monitoring Requirements	Timing
4.9 Hydrology and Water Quality  <i>Impact HY-1: Violate water quality standards or waste discharge requirements.</i>	<p>APM AQ-3: Minimization of Disturbed Areas. See above.  APM AQ-4: Watering Prior to Grading and Excavation. See above.  APM AQ-6: Fugitive Dust from High Winds. See above.  APM BR-3: Post-construction Restoration for Reconductoring. See above.  APM GE-1: Geotechnical Studies. See above.  <del>APM GE-2: Seismic-resistant-Design Measures. See above.</del>  APM GE-3: Erosion and Sediment Control. See above.  APM HZ-32: Hazardous Materials Spill and Release Prevention. See above.  APM HZ-43: Contaminated Soil Disposal. See above.  APM HZ-54: Hazardous Materials Use and Storage and Hazardous Waste. See above.  APM PS-1: Site Cleanup. See below.</p>	See above/below.	See above/below.

**Exhibit A-1: Revised Table ES-1 and 7-1**

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) APM PS-2: Non-hazardous Waste Management. See below.	Monitoring Requirements	Timing
<i>Impact HY-3: Substantial alteration of the existing drainage pattern of the site or area.</i>	APM AQ-3: Minimization of Disturbed Areas. See above. APM BR-3: Post-construction Restoration for Reconductoring. See above. APM GE-3: Erosion and Sediment Control. See above. MM BR-5: Impacts on Hydrologic Features. See above.	See above.	See above.
<i>Impact HY-8: Risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow.</i>	APM GE-1: Geotechnical Studies. See above. <del>APM GE-2: Seismic-resistant Design Measures. See above.</del>	See above.	See above.
<b>4.10 Land Use and Planning</b>			
No applicable APMs or mitigation measures.			
<b>4.11 Noise</b>			
<i>Impact NS-1: Noise levels in excess of standards established in the local general plan or noise ordinance.</i>	<p><b>APM NS-1: Construction Hours.</b> The applicant and SCE will ensure that construction of the proposed project components will comply with all applicable City of Los Angeles, City of Santa Clarita, County of Los Angeles, and County of Ventura noise regulations. Construction activities will generally be scheduled during daylight hours (7:00 a.m. to 5:00 p.m.) Monday through Friday and some Saturdays.</p> <p><b>APM NS-2: Construction Noise Control Plan.</b> SCE will prepare and implement a noise control plan to address all SCE structure installation/replacement and substitution modifications associated with the SCE-proposed project components. Construction measures required by the Noise Control Plan will include, but not be limited to, the following: Stockpiling and vehicle staging areas will be located as far away from occupied residences as possible; All stationary construction equipment will be operated as far away from residential uses as possible; To the extent feasible, haul routes for removing excavated materials or delivery of materials from each respective project component site will be designed to avoid residential areas</p>	<p>Ensure that construction activities are scheduled during daylight hours Monday through Saturday or that variances from noise ordinances are obtained as necessary (APM NS-1). Ensure that the applicant and SCE notify sensitive receptors about construction as specified in APM NS-3. Ensure that SCE implements a Noise Control Plan (APM NS-2) and all noise control and reduction measures as specified in MM NS-1. See additional requirements for APM NS-1 through NS-4 and MM NS-1.</p>	Prior to, during, and after construction

Exhibit A-1: Revised Table ES-1 and 7-1

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) and areas occupied by residential receptors (e.g., hospitals, schools, convalescent homes, etc.), and idling construction equipment will be turned off when not in use for periods longer than 15 minutes. <b>APM NS-3: Notification Procedures.</b> At least two weeks prior to construction, the applicant and SCE will notify all sensitive receptors within 300 feet of construction activities of the potential to experience significant noise levels during construction. <b>APM NS-4: Operational Noise Control.</b> MM NS-2: Operational Noise Control. After construction of the Central Compressor Station is completed, the applicant will take measures as necessary to ensure that the operational noise levels from the Central Compressor Station do not exceed 45 dBA at the closest receptor in the City of Los Angeles. Measures that may be implemented to achieve this level during the operational phase for turbines, compressors, and cooling equipment proposed to be installed at the Central Compressor Station could include: Turbines will be placed within an acoustical enclosure. Compressor noise will be mitigated by placing an acoustical blanket over the compressor itself or enclosing the compressor within an appropriately rated acoustical building. Noise emitted from gas process coolers will be mitigated by installing acoustic barriers without gaps around the equipment casing and with a continuous minimum surface density of 10 kilograms per square meter in order to minimize the transmission of sound. <b>MM NS-4: Noise Reduction and Control Practices.</b> SCE will employ the following noise reduction and control practices during subtransmission line reconductoring and fiber-optic installation activities that could produce noise levels above 80 dBA Leq near sensitive receptors (within 100 feet): Construction equipment, stationary or mobile, will be equipped with properly operating and maintained mufflers on engine exhausts and compressor components. Construction equipment specifically designed for low noise emissions (i.e., equipment that is powered by electric or natural gas engines instead of diesel or gasoline reciprocating engines) will be used as much as feasible. Electric engines have been reported to have lower noise levels than internal combustion engines. Temporary enclosures or acoustic barriers (i.e., solid sound absorber composite materials) will be used around stationary pieces of equipment. Noise barriers or enclosures will be selected with a sound transmission class of 30 or greater, in accordance with American Society of Testing and Materials Test Method E90. Acoustical curtain enclosures can provide a sound transmission loss of 10 to 13 dBA, whereas portable solid barriers can achieve up to 33 dBA in noise reduction. Acoustic barriers will be used for all construction	Monitoring Requirements	Timing
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Exhibit A-1: Revised Table ES-1 and 7-1

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
Impact NS-3: Permanent increase in ambient noise levels in the project vicinity.	activities within 100 feet of closest receptors. Construction traffic will be routed away from residences and other sensitive receptors, as feasible. Noise from back-up alarms (alarms that signal vehicle travel in reverse) in construction vehicles and equipment will be reduced by providing a layout of construction sites that minimizes the need for back-up alarms and using flagmen to minimize time needed to back up vehicles. As feasible, and in compliance with the applicant's safety practices and public and worker safety provisions required in the Occupational Safety and Health Standards for the Construction Industry (29 CFR Part 1926), the applicant may also use self-adjusting, manually adjustable, or broadband back-up alarms to reduce construction noise.		
Impact NS-4: Substantial temporary or periodic increase in ambient noise levels in the project vicinity.	APM NS-4: Operational Noise Control. See above. No applicable APMs or mitigation measures.	See above.	See above.
4.12 Population and Housing	APM NS-4: Operational Noise Control. See above. MM NS-4: Noise Reduction and Control Practices. See above. No applicable APMs or mitigation measures.	See above.	See above.
No applicable APMs or mitigation measures.			
4.13 Public Services and Utilities			
Impact PS-1: Result in substantial adverse physical impacts associated with new or physically altered governmental facilities.	APM HZ-2: Plant Power Line Inspection and Maintenance. See above. APM HZ-87: Construction Safety and Emergency Response Plan. See above. MM HZ-2: Fire Department Review and Coordination. See above.	See above.	See above.
Impact PS-5: Served by a landfill without sufficient permitted capacity to accommodate the proposed project's solid waste disposal needs.	APM HZ-54: Hazardous Materials Use and Storage and Hazardous Waste. See above. APM HZ-76: Wood Pole Recycling and Disposal. See above. APM PS-2: Nonhazardous Waste Management. The applicant and SCE will ensure that nonhazardous waste materials, including wood, soil, vegetation, and sanitation waste (portable toilets) that would be generated during construction of the project components will either be re-used at the project component construction sites (e.g., clean soil used for backfill) or disposed of at an appropriately licensed	See requirements for APMs HZ-5, HZ-7, and PS-2.	During construction

Exhibit A-1: Revised Table ES-1 and 7-1

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
<i>Impact PS-6: Noncompliance with federal, state, or local statutes and regulations related to solid waste.</i>	<p><b>APM HZ-54:</b> Hazardous Materials Use and Storage and Hazardous Waste. See above.</p> <p><b>APM PS-1: Site Cleanup.</b> The applicant and SCE will direct construction contractors to perform initial site cleanup immediately following construction activities at each of the proposed project components. Initial site cleanup at each project component area will include the following: Removal of all construction debris; Proper disposal or recycling of all construction materials and debris at appropriately licensed landfills and other offsite facilities; and Inspection of project component sites to ensure that cleanup activities are successfully completed.</p> <p><b>APM PS-2: Non-hazardous Waste Management.</b> See above.</p>	See requirements for APMs HZ-5, PS-1, and PS-2.	During construction
<b>4.14 Recreation</b>			
No applicable APMs or mitigation measures.			
<b>4.15 Transportation and Traffic</b>			
<i>Impact TT-1: Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.</i>	<p><b>APM TT-1: Traffic Control Plan.</b> The applicant and SCE will prepare Traffic Control Plans in accordance with the latest version of the California Joint Utility Traffic Control Manual. These Traffic Control Plans will be implemented by the applicant and SCE as needed. The Traffic Control Plans will be developed to minimize short-term construction-related impacts on local traffic and potential traffic safety hazards, and will include measures such as the installation of temporary warning signs at strategic locations near access locations for the project components. The signs will be removed after construction-related activities are completed. The Traffic Control Plans may include the following measures:</p> <ul style="list-style-type: none"> <li>• Coordination with the City of Los Angeles, City of Santa Clarita, County of Los Angeles, or County of Ventura on any temporary land or road closures;</li> <li>• Installation of traffic control devices as specified in the California Joint Utility Traffic Control Manual;</li> <li>• Provisions for temporary alternate routes to route local traffic around</li> </ul>	Ensure that the applicant and SCE develop and implement a Traffic Control Plan (APM TT-1) and Commuter Plan (APM TT3). See additional requirements for APMs TT-1 and TT-3.	Prior to and during construction

**Exhibit A-1: Revised Table ES-1 and 7-1**

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) construction zones; and Consultation with emergency service providers and development of an Emergency Access Plan for emergency vehicle access in and adjacent to the construction zone. <b>APM TT-3: Commuter Plan.</b> The applicant would implement a Commuter Plan that includes a designated offsite parking area that has adequate parking capacity for 150 workers (the peak construction-activity maximum not including SCE workers) and a shuttle that would transport worker crews (approximately 10 workers per trip) from the parking area to worksites.	Monitoring Requirements	Timing
<i>Impact TT-2: Conflict with an applicable congestion management program including, but not limited to, LOS standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.</i>	<b>APM TT-1: Traffic Control Plan.</b> See above. <b>APM TT-3: Commuter Plan.</b> See above.	See above.	See above.
<i>Impact TT-3: Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).</i>	<b>APM TT-1: Traffic Control Plan.</b> See above.	See above.	See above.
<i>Impact TT-4: Result in inadequate emergency access.</i>	<b>APM TT-1: Traffic Control Plan.</b> See above. <b>APM TT-3: Commuter Plan.</b> See above.	See above.	See above.
<i>Impact TT-5: Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.</i>	<b>APM TT-1: Traffic Control Plan.</b> See above. <b>APM TT-2: Repair of Damaged Roads.</b> The applicant and SCE will ensure that damage to existing roads that is the direct result of activities related to construction of the proposed project components will be repaired once construction is complete in accordance with local jurisdiction requirements and/or existing franchise agreements held by the applicant and SCE.	See requirements for APMs TT-1 and TT-2.	Prior to, during, and after construction



Comment O2-194  
refers to all Exhibit A-2

## EXHIBIT A-2

Exhibit A-2

Habitat Evaluation for Breeding Least Bell's Vireo and Southwestern Willow Flycatcher

Methodology

Least Bell's Vireo (*Vireo bellii pusillus*) (LBV) and Southwestern willow flycatcher (*Empidonax traillii eximius*) (SWWF) have specific habitat parameters required for successful recruitment during the breeding season. In order to determine the suitability for both species to utilize drainages areas during the breeding season that may be potentially impacted during project activities, a field assessment of linear areas not previously analyzed was conducted to evaluate habitat parameters identified during a scientific literature review. During an aerial analysis utilizing Google Earth, nine linear areas were identified within the project that crosses drainages with potential habitat. Areas 1-8 occurred on telecommunication route 2 and Area 9 occurred on the 66 kV subtransmission alignment. Field evaluations of the nine areas were conducted by endangered species biologist Thomas Juhasz and verified by ornithologist Doug Willick. The riparian habitat that occurs in Limekiln Canyon Wash was previously described within the DEIR; this information is utilized to evaluate habitat suitability for LBV and SWWF. The results of the field evaluations of habitat parameters for nesting LBV and SWWF and the literature review of Limekiln Canyon Wash are presented in Tables 1 and 2. Field assessment notes and maps are included within Attachments 1 and 2.

Description of Breeding Habitat - Least Bell's Vireo

Optimal breeding habitat for least Bell's vireo (LBV) is constituted of climax riparian vegetation with a dense understory of young willows (*Salix* spp.), mulefat (*Baccharis salicifolia*), Mexican elderberry (*Sambucus mexicana*), California rose (*Rosa californica*), mugwort (*Artemisia douglasiana*), poison oak (*Toxicodendron diversilobum*), and wild grape (*Vitis* sp.) (USFWS 1998). Three ecological variables consistently determine habitat quality for LBV: 1) the presence of *Salix* spp.; 2) the tiered stratification of vegetation within riparian breeding habitat; and, 3) the width of the willow riparian habitat. LBV closely associated with habitat dominated by *Salix* sp. with low amounts of aquatic and herbaceous cover (USFWS 1998). LBVs exhibit a clear preference for relatively broad riparian habitats, which typically exhibit more stratification of vegetation. It was noted that an increase in occupied habitat occurs as the width of the willow riparian woodland exceeds 50 meters wide versus 10 meters or less (USFWS 2006). Due to concerted conservation measures, LBV populations are recovering in southern and central California and are occupying habitat left vacant since the mid 1930s. As local populations continue to expand, and occupy the remaining areas of more typical habitat, a higher incidence of LBV utilizing lower quality or "marginal" habitats occurs.

Breeding Habitat Evaluation - Least Bell's Vireo

As presented in the Methodology Section, eight areas along Telecom Route 2 and one area along the 66-kV subtransmission alignment (as presented in the DEIR) were identified for evaluation during field efforts based on presence of potential riparian habitat. Limekiln Canyon Wash was evaluated through the information presented in the DEIR.

- Limekiln Canyon Wash contains willow scrub that is fragmented from other contiguous habitat by a paved road and a channelized conduit. The willows are currently recovering from a past fire event and are surrounded by ruderal vegetation on the banks. As the vegetation is isolated by roads and channelized drainages from other habitat and does not retain the habitat complexity preferred by LBV.
- Area 1 at Box Canyon Road does not have the habitat complexity or standing water preferred by LBV.
- Areas 2, 4 and 6 had marginal to moderate suitability for least Bell's vireo; as riparian habitats are linear in feature, there is likelihood that vireos will utilize the habitat within the buffer zones if they are connected to other suitable habitat (Areas 2, 4 and 6). The habitat is marginal to moderate due to vegetation composition and structure but is well below the 0.5 to 7.5 acre nesting territory size required by LBV (USFWS 2006).
- Area 3 is a drainage with surface water dominated by coast live oak (*Quercus agrifolia*). The understory is open with thickets of poison oak on the floor. The stratified layers of understory vegetation required by LBV are not present.

- Area 5 does not have the required habitat size and complexity required by nesting LBV. The riparian vegetation is isolated within swatches of ruderal vegetation.
- Area 7 has an ephemeral swale that runs through coast live oak woodland with an annual grassland understory. Suitable habitat is absent in Area 7.
- Area 8 is well below the typical breeding habitat size (0.5 acres +) and linear habitat width with a rapidly flowing but very shallow channel that might be seasonally intermittent.
- The riparian habitat within Area 9 has marginal suitability due to the permanent disturbances along the drainage (5 freeway corridor, development).

There is potential for LBV to occur in project area due to the reoccupation of the Santa Clara and Los Angeles River Systems by singing males (Sepulveda Basin Wildlife Refuge); however, the habitat is either unsuitable (Limekiln Canyon Wash, Areas 1, 3, 5, 7, 8) or is only marginal to moderately suitable (Areas 2, 4, 6, 9) due to constricted habitat size and a lack of stratified, dense vegetation required for successful recruitment during the breeding season.

TABLE 1: SUITABILITY OF HABITAT WITHIN DRAINAGES FOR LEAST BELL'S VIREO BREEDING SITES

Drainage Site	Primary Constituent Elements for Breeding, Reproduction, Rearing of Offspring Presence (Y or N)							Habitat Suitability <sup>1</sup>
	Perennial Water	Riparian Vegetation Dominated by Willows	Suitable Habitat Greater Than 0.5 Acres	Contiguous with Other Riparian Habitat	Dense Foliage from Ground-level to 4 m	Structurally Diverse Canopy	Proximity to Human Disturbance(s)	
Limekiln Canyon Wash <sup>2</sup>	Yes <sup>1</sup>	Yes	No	No	No	No	Adjacent to access road	Unsuitable
Site 1 Box Canyon Road	No	Yes	No	No	No	No	Adjacent to road	Unsuitable
Site 2 Santa Susana Road	Yes	No	Yes	Yes	No	Yes	Adjacent to road and baseball field	Marginal to Moderate
Site 3 Santa Susana Road	Yes	No	No	Yes	No	No	Natural	Unsuitable
Site 4 Devils Canyon Creek	Yes	Yes	No	Yes	No	No	Natural	Marginal to Moderate
Site 5 Browns Canyon Creek	Yes <sup>2</sup>	Yes	No	No	No	No	Adjacent to concrete low flow crossing	Unsuitable
Site 6 Browns Canyon Creek	Yes <sup>2</sup>	Yes	No	Yes	Yes	Yes	Natural	Marginal to Moderate
Site 7 Browns Canyon Creek	No	No	No	Yes	No	No	Natural area	Unsuitable
Site 8 Browns Canyon Creek	Yes <sup>2</sup>	Yes	No	Yes	No. Open understory.	No	Natural area	Unsuitable
Site 9 Subtransmission Route	Yes	Yes	Yes	Contiguous northwards; cut off to the south by a road.	No	Yes	Constricted by development and the 5 Freeway	Marginal

<sup>1</sup>Two small perennial ponds exist in the detention basin

<sup>2</sup>Surface water flow may cease during the summer months.

1. Terms are defined as follows: Unsuitable = Habitat does not contain the parameters needed for successful recruitment; Marginal = Habitat contains some habitat qualities required by the species but does not contain enough to facilitate nesting success; Moderate = Habitat meets enough requirements to support breeding efforts; Suitable = Contains optimal parameters required by the species for recruitment.

#### **Description of Breeding Habitat - Southwestern Willow Flycatcher**

Breeding habitat for Southwestern willow flycatcher (SWWF) is restricted to dense, well-developed riparian woodland with stratified layers occurring within the vegetation. Breeding territories are based near lentic (quiet, slow-moving, swampy, or still) surface water or saturated soil (USFWS 2002). Occupied sites are typically located along slow-moving stream reaches; at river backwaters; in swampy abandoned channels and oxbows; marshes; and at the margins of impounded water (e.g., beaver ponds, inflows of streams into reservoirs) (USFWS 2002). Where SWWF's occur along moving streams, those streams tend to be of relatively low gradient, i.e., slow-moving with few (or widely spaced) riffles (USFWS 2002). Sogge et al. (1997) suggest that nesting habitat for SWWF is on average two acres or greater in extent, with linear-shaped habitats at least 10 meters (33 feet) wide. Specific habitat characteristics, such as species composition and diversity, dominant vegetation, and vegetative structure, are quite varied. However, vegetation where nest sites are located typically have a pronounced canopy with dense foliage from the ground level up to approximately 4 m (13 ft) above ground (USFWS 2002). One of the key elements for SWWF is that they definitely prefer the presence of surface water within their territories through the entire breeding season. In many cases, flycatcher nest plants are rooted in or overhang standing water (USFWS 2002).

SWWF's have not been found in confined floodplains where only a single narrow strip of riparian vegetation less than approximately 10 m (33 feet) wide develops unless it is connected to larger riparian zones (USFWS 2002). Unsuitable breeding habitat for SWWF includes areas comprised solely of young or emergent vegetation less than 2 m tall; steep-walled and heavily bouldered narrow canyons; habitats composed exclusively of cattail (*Typha* spp.), sedge (*Carex* spp.), and rush (*Juncus* spp.), and reaches of more mature, shrub-like vegetation that formed very dense stands less than 2 m tall and do not possess an overstory (e.g. mule fat (*Baccharis glutinosa*) thickets) (Rouke et. Al 2004).

#### **Breeding Habitat Evaluation - Southwestern Willow Flycatcher**

As described in the Methodology Section above, nine linear areas were identified with potential breeding habitat and have been evaluated to determine suitability. The drainage crossings within the nine linear areas do not have the habitat parameters required by breeding SWWF. Limiting factors for the nine linear areas and Limekiln Canyon Wash area are presented in the bulleted list below:

- As presented in the DEIR, Limekiln Canyon Wash contains willow scrub that is fragmented from other contiguous habitat by a paved road and a channelized conduit. The willows are currently recovering from a past fire event and are surrounded by ruderal vegetation on the banks. As the vegetation is isolated by roads and channelized drainages from other habitat and does not retain the habitat complexity preferred by SWWF.
- Area 1 at Box Canyon Road does not have the habitat complexity or standing water preferred by SWWF.
- Area 2 has the riparian canopy preferred by SWWF and is connected to a larger riparian habitat; however, the steep canyon walls enveloping the site and the limited understory vegetation occurring to 4 meters high (sparse poison oak) makes this riparian corridor less favorable for SWWF recruitment.

- Area 3 is a drainage with surface water dominated by coast live oak (*Quercus agrifolia*). The understory is open with thickets of poison oak on the floor. The stratified layers of understory vegetation required by SWWF are not present.
- Area 4 on Devils Canyon Creek has lentic water present with dense vegetation but does not have the average vegetation typical breeding habitat size (2 acres +) required by the species. The steep canyon walls along Devils Canyon Creek preclude the formation of broader habitat areas preferred by SWWF.
- Area 5 does not have the required habitat size and complexity needed for SWWF breeding territories.
- Area 6 has appropriate understory vegetation and canopy, but is well below the patch size and linear habitat width needed by the species.
- Area 7 has an ephemeral swale that runs through coast live oak woodland with an annual grassland understory. Suitable habitat is absent in Area 7.
- Area 8 is well below the typical breeding habitat size (2 acres +) and linear habitat width with a rapidly flowing channel that might be intermittent in flows.
- Area 9 is unsuitable habitat due to the permanent disturbances along the drainage (5 freeway corridor, development).

All sites are suitable for passage *Empidonax* flycatchers but do not provide the habitat parameters needed by SWWF for successful recruitment within the breeding season from May to July.

TABLE 2: SUITABILITY OF HABITAT WITHIN DRAINAGES FOR SOUTHWESTERN WILLOW FLYCATCHER BREEDING SITES

Drainage Site	Primary Constituent Elements for Breeding, Reproduction, Rearing of Offspring Presence (Y or N)									Habitat Suitability <sup>1</sup>
	Perennial Water	Riparian Vegetation	Vegetation Patch Greater Than 2 Acres	Linear Habitat at least 10m Wide	Contiguous with other Riparian Habitat	Vegetation Exceeds 2m Height	Dense Foliage from Ground-Level to 4m	Stratified Vegetation Layers	Proximity to Human Disturbance(s)	
Limekiln Canyon Wash <sup>2</sup>	Yes <sup>1</sup>	Yes	No	No	No	No	No	No	Adjacent to access road	Unsuitable
Site 1 Box Canyon Road	No	Yes	No	No	No	Yes	No	No	Adjacent to road	Unsuitable
Site 2 Santa Susana Road	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Adjacent to road and baseball field	Unsuitable
Site 3 Santa Susana Road	Yes	No	No	No	Yes	Yes	No	No	Natural	Unsuitable
Site 4 Devils Canyon Creek	Yes	Yes	No	Yes	Yes	No	No	No	Natural	Unsuitable
Site 5 Browns Canyon Creek	Yes <sup>2</sup>	Yes	No	No	No	No	No	No	Adjacent to concrete low flow crossing	Unsuitable
Site 6 Browns Canyon Creek	Yes <sup>2</sup>	Yes	No	No	Yes	Yes	Yes	Yes	Natural	Unsuitable
Site 7 Browns Canyon Creek	No	No	No	No	Yes	Yes	No	No	Natural area	Unsuitable
Site 8 Browns Canyon Creek	Yes <sup>2</sup>	Yes	No	No	Yes	Yes	No. Open understory.	No. dominated by coast live oak	Natural area	Unsuitable
Site 9 Subtransmission Route	Yes	Yes	No	Yes	Yes northwards; cut off to the south by a road.	Yes	No	No	Constricted by development and the 5 Freeway	Unsuitable

<sup>1</sup> Two small perennial ponds exist in the detention basin

<sup>2</sup> Surface water flow may cease during the summer months.

1. Terms are defined as follows: Unsuitable = Habitat does not contain the parameters needed for successful recruitment; Marginal = Habitat contains some habitat qualities required by the species but does not contain enough to facilitate nesting success; Moderate = Habitat meets enough requirements to support breeding efforts; Suitable = Contains optimal parameters required by the species for recruitment.

<sup>1</sup> Two small perennial ponds exist in the detention basin

<sup>2</sup> Surface water flow may cease during the summer months.

1. Terms are defined as follows: Unsuitable = Habitat does not contain the parameters needed for successful recruitment; Marginal = Habitat contains some habitat qualities required by the species but does not contain enough to facilitate nesting success; Moderate = Habitat meets enough requirements to support breeding efforts; Suitable = Contains optimal parameters required by the species for recruitment.

**References:**

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Sogge, M. K., R. M. Marshall, S. J. Sferra, and T. J. Tibbitts. 1997. A Southwestern Willow Flycatcher natural history summary and survey protocol. National Park Service/USGS Colorado Plateau Research Station, Northern Arizona University. NRTR-97/12.

U.S. Fish and Wildlife Service. 2002. Southwestern Willow Flycatcher Recovery Plan. Albuquerque, New Mexico. i-ix + 210 pp., Appendices A-O

U.S. Fish and Wildlife Service (USFWS). 1998. Draft Recovery Plan for the Least Bell's Vireo. Fish and Wildlife Service, Portland, OR. 139 pp.

U.S. Fish and Wildlife Service (USFWS). 2006. Least Bell's Vireo: 5- Year Review Summary and Evaluation. Fish and Wildlife Service, Carlsbad, CA. 26 pp.



#### Site 1 - Box Canyon Road

- Drainage characteristic: An ephemeral stream with no flowing water. Channel width is approximately 4 feet wide. The channel drops off steeply as it flows to the west; no pooling water is able to develop in the area.
- Vegetation structure: Riparian vegetation dominated by arroyo willow and Mexican elderberry interspersed with canyon sunflower, branching phacelia, and poison oak within the understory.
- Suitability for least Bell's vireo breeding territory: Willow thickets are present but are isolated from other riparian habitat. The lack of standing water precludes this from being suitable vireo breeding habitat.
- Suitability for Southwestern willow flycatcher breeding territory: The narrow ephemeral wash retains enough moisture to induce the growth of willows but does not provide the tiered vegetation and perennial water source required by willow flycatchers to successfully breed. Site 1 is not suitable for Southwestern willow flycatcher.

**Site 1 Box Canyon Road**  
Plant Species Observed within CDFG jurisdiction

Scientific Name	Common Name	Native
<i>Artemisia douglasiana</i>	Douglas mugwort	yes
<i>Gnaphalium californicum</i>	California everlasting	yes
<i>Phacelia ramosissima</i>	Branching phacelia	yes
<i>Rubus ursinus</i>	California blackberry	yes
<i>Salix lasiolepis</i>	Arroyo willow	yes
<i>Sambucus mexicana</i>	Mexican elderberry	yes
<i>Toxicodendron diversilobum</i>	Poison oak	yes
<i>Vegetaria carpesioides</i>	Canyon sunflower	yes



**Photo 1-a:** Looking into the ephemeral stream from Santa Susana Pass Road. The canopy is dominated by arroyo willow with an occasional Mexican elderberry. Coast live oaks and patchy undifferentiated scrub are present upslope.



**Photo 1-b:** The understory of the ephemeral wash. Dominant species are poison oak, branching phacelia, and canyon sunflower. The lack of flowing water and a multitiered vegetation structure precludes either special-status bird species from establishing breeding territories.



**Photo 1-c:** Debris piles have built up in several parts of the ephemeral wash.

#### Site 2- Santa Susana Pass Road

- Drainage characteristic: A flowing stream approximately 1 foot wide and 10 inches deep. Flow appears to be perennial.
- Vegetation structure: Mixed riparian forest occurs within the drainage and is dominated by Fremont cottonwood, white alder, coast live oak, and red willow. The understory is dominated by poison oak and is interspersed with a midstory edible fig and shamel ash. Coast live oak and laurel sumac are present upslope.
- Suitability for least Bell's vireo breeding territory: The habitat currently present at Site 2 is marginal to moderate breeding habitat for least Bell's vireo. Optimal habitat is dominated by willows and has a well developed understory; however, the species could utilize the habitat present for breeding.
- Suitability for Southwestern willow flycatcher breeding territory: The mature riparian canopy provides the height required by the species but the area is neither extensive enough in size nor has an understory dense enough for suitable breeding habitat.

**Site 2 Santa Susana Pass Road**  
Plant Species Observed within CDFG jurisdiction

Scientific Name	Common Name	Native
<i>Alnus rhombifolia</i>	White alder	yes
<i>Ficus carica</i>	Edible fig	no
<i>Fraxinus udhei</i>	Shamel ash	no
<i>Malosma laurina</i>	Laurel sumac	yes
<i>Populus fremontii</i>	Fremont cottonwood	yes
<i>Quercus agrifolia</i>	Coast live oak	yes
<i>Salix laevigata</i>	Red willow	yes
<i>Toxicodendron diversilobum</i>	Poison oak	yes





**Photo 2-a:** The understory is heavily dominated by poison oak.



**Photo 2-b:** understory of the drainage adjacent to the utility line. . Note the presence of refuse and non-native shamel ash saplings.



**Photo 2-c:** view of the drainage from Santa Susana Pass Road. This area past the emergent *Eucalyptus* sp. is beyond the buffer area and will not be impacted by project activities.

**Site 3- Santa Susana Pass Road**

- Drainage characteristic: A flowing stream with large alluvial boulders approximately 3 feet wide and 1 foot deep. Flow appears to be perennial.
- Vegetation structure: Coast live oak is dominant within the drainage with intermittent western sycamore and California walnut. The understory is dominated by poison oak.
- Suitability for least Bell's vireo breeding territory: Due to a lack of willows and a tiered vegetation structure, the habitat present does not constitute suitable breeding habitat for least Bell's vireo.
- Suitability for Southwestern willow flycatcher breeding territory: Due to a lack of willows and a tiered vegetation structure, the habitat present does not constitute suitable breeding habitat for southwestern willow flycatcher.

**Site 3 Santa Susana Pass Road**  
Plant Species Observed within CDFG jurisdiction

Scientific Name	Common Name	Native
<i>Dryopteris arguta</i>	Coastal wood fern	yes
<i>Juglans californica</i>	California walnut	yes
<i>Keckiella cordifolia</i>	Heart leaved penstemon	yes
<i>Mimulus aurantiacus</i>	Bush monkeyflower	yes
<i>Platanus racemosa</i>	Western sycamore	yes
<i>Quercus agrifolia</i>	Coast live oak	yes
<i>Toxicodendron diversilobum</i>	Poison oak	yes





**Photo 3-a:** View of the flowing water in the channel. Dense thickets of poison oak envelop the banks.



**Photo 3-b:** View of the understory. The middle story is sparse, with only an occasional western sycamore sapling or a California walnut occurring.



**Photo 3-c:** view of a California walnut emerging from the poison oak thicket.

#### Site 4- Devils Canyon Creek

- Drainage characteristic: A perennial flowing stream alternating between riffles and pools is within an approximately 5 foot wide channel. The average depth of a pool is 1 foot.
- Vegetation structure: Riparian vegetation dominated by arroyo and sandbar willow interspersed with California walnut. Mulefat, California rose, California blackberry, and giant wild rye compose a thick understory.
- Suitability for least Bell's vireo breeding territory: Due to the recent burn, the riparian habitat is still recovering to its previous climax state. The habitat currently present in Devils Canyon Creek is marginal to moderate suitable for nesting least Bell's vireo.
- Suitability for Southwestern willow flycatcher breeding territory: Due to the recent burn, the riparian habitat is still recovering to its previous climax state. The narrow channel and associated floodplain does not provide the density or tiered canopy required by willow flycatcher breeding territory.

**Site 4 Devils Canyon Creek**  
Plant Species Observed within CDFG jurisdiction

Scientific Name	Common Name	Native
<i>Anagallis arvensis</i>	Scarlet pimpernel	no
<i>Artemisia douglasiana</i>	Douglas mugwort	yes
<i>Hirschfeldia incana</i>	Field mustard	no
<i>Juglans californica</i>	California walnut	yes
<i>Lamium amplexicaule</i>	Henbit	no
<i>Malosma laurina</i>	Laurel sumac	yes
<i>Nicotiana glauca</i>	Tree tobacco	no
<i>Oenothera elata</i>	Hookers evening primrose	yes
<i>Phacelia ramosissima</i>	Branching phacelia	yes
<i>Polypogon monspeliensis</i>	Rabbits foot grass	no
<i>Quercus agrifolia</i>	Coast live oak	yes
<i>Rosa californica</i>	California wild rose	yes
<i>Salix exigua</i>	Sandbar willow	yes
<i>Salix lasiolepis</i>	Arroyo willow	yes
<i>Toxicodendron diversilobum</i>	Poison oak	yes





**Photo 4-a:** view of the Devils Canyon Creek as it flows within the buffer zone. The previously burned arroyo willows have resprouted and are beginning to shade the pool again.



**Photo 4-b:** The recovering riparian vegetation along Devils Canyon Creek. Mulefat, arroyo willow, and sandbar willow are forming dense vegetation in the as the water flow is constricted between the steep slopes.



**Photo 4-c:** view of pool with overhanging willows.



**Site 5- Browns Canyon Creek**

- Drainage characteristic: A lightly flowing stream approximately 1 foot wide and 1 inch deep through a deep sand deposit. Flow can be ephemeral in times of drought.
- Vegetation structure: Riparian vegetation occurs in patches isolated from each other by ruderal vegetation covering the sand bank. A low flow concrete structure bisects the stream. Coast live oak woodland occurs upslope from the channel.
- Suitability for least Bell's vireo breeding territory: Due to the fragmented nature of the riparian habitat, no suitable breeding habitat for least Bell's vireo is present.
- Suitability for Southwestern willow flycatcher breeding territory: Due to the fragmented nature of the riparian habitat, no suitable breeding habitat for willow flycatcher is present.

**Site 5 Browns Canyon Creek**  
Plant Species Observed within CDFG jurisdiction

Scientific Name	Common Name	Native
<i>Artemisia douglasiana</i>	Douglas mugwort	yes
<i>Hirschfeldia incana</i>	Field mustard	no
<i>Juglans californica</i>	California walnut	yes
<i>Nicotiana glauca</i>	Tree tobacco	no
<i>Phacelia cicutaria</i>	Caterpillar phacelia	yes
<i>Phacelia ramosissima</i>	Branching phacelia	yes
<i>Polypogon monspeliensis</i>	Rabbits foot grass	no
<i>Quercus agrifolia</i>	Coast live oak	yes
<i>Salix lasiolepis</i>	Arroyo willow	yes
<i>Vinca major</i>	Greater periwinkle	no



**Photo 5-a:** Browns Canyon Creek flowing through a ruderal clearing. The stands of riparian vegetation are isolated from each other in the buffer area by the clearings.



**Photo 5-b:** View of the concrete low flow crossing that separates two stands of riparian vegetation.



**Photo 5-c:** View of a riparian stand within the buffer zone. Species composition includes California walnut, arroyo willow, tree tobacco, and Douglas mugwort.

#### Site 6- Browns Canyon Creek

- Drainage characteristic: A lightly flowing stream approximately 20 inches wide and 2 inches deep. Flow can be ephemeral in times of drought.
- Vegetation structure: The canopy is dominated by arroyo willow with a mixed species understory. The riparian channel is bordered by coast live oaks and undifferentiated scrub upslope.
- Suitability for least Bell's vireo breeding territory: Marginal breeding habitat for least Bell's vireo is present within Site 6 due to the limited amount of suitable riparian vegetation within the riparian corridor.
- Suitability for Southwestern willow flycatcher breeding territory: Flowing water is present but the narrow corridor of riparian vegetation and the lack of very dense, stratified vegetation makes site 6 unsuitable for a breeding pair of southwestern willow flycatchers.

**Site 6 Browns Canyon Creek**  
Plant Species Observed within CDFG jurisdiction

Scientific Name	Common Name	Native
<i>Artemisia douglasiana</i>	Douglas mugwort	yes
<i>Baccharis salicifolia</i>	Mulefat	yes
<i>Carex spissa</i>	San Diego sedge	yes
<i>Epipactis giganteum</i>	Giant stream orchid	yes
<i>Quercus agrifolia</i>	Coast live oak	yes
<i>Rubus ursinus</i>	California blackberry	yes
<i>Salix lasiolepis</i>	Arroyo willow	yes
<i>Stachys bullata</i>	California hedge nettle	yes
<i>Toxicodendron diversilobum</i>	Poison oak	yes





**Photo 6-a:** A thicket of California blackberry occurs underneath willows and up onto the adjacent slope.



**Photo 6-b:** Flowing water is bordered by mulefat, young willows, California hedge nettle, and California blackberry.



**Photo 6-c:** The riparian vegetation at Site 6 is well tiered.

#### Site 7- Browns Canyon Creek

- Drainage characteristic: An ephemeral stream with a light trickle that is less than an inch deep.
- Vegetation structure: The canopy is dominated by coast live oak within an occasional western sycamore. The understory is composed nearly entirely by non-native annual grasses.
- Suitability for least Bell's vireo breeding territory: Due to an intermittent water flow, a lack of willows and a tiered vegetation structure the habitat present does not constitute suitable breeding habitat for least Bell's vireo.
- Suitability for Southwestern willow flycatcher breeding territory: Due to an intermittent water flow, a lack of willows and a tiered vegetation structure the habitat present does not constitute suitable breeding habitat for southwestern willow flycatcher.

**Site 7 Browns Canyon Creek**  
Plant Species Observed within CDFG jurisdiction

Scientific Name	Common Name	Native
<i>Baccharis salicifolia</i>	Mulefat	yes
<i>Bromus diandrus</i>	Ripgut brome	no
<i>Bromus madritensis</i>	Foxtail brome	no
<i>Elymus glaucus</i>	Blue wild rye	yes
<i>Platanus racemosa</i>	Western sycamore	yes
<i>Quercus agrifolia</i>	Coast live oak	yes
<i>Solanum douglasii</i>	Douglas nightshade	yes





**Photo 7-a:** No hydrophytic vegetation is present in channel. Coast live oak woodland with an annual grass understory is the dominant vegetation type.



**Photo 7-b:** Coast live oak with annual grasses. More mulefat begins to appear in the background as moisture increases.



**Photo 7-c:** the lightly flowing channel is edged by annual grassland and oak woodland. No riparian vegetation is present.

#### Site 8- Browns Canyon Creek

- Drainage characteristic: A perennial flowing stream 20 inches wide and 3 inches deep. Can possibly become ephemeral under drought conditions.
- Vegetation structure: The canopy is dominated by coast live oak within an intermittent arroyo willow. The sparse understory is composed of thicket forming species such as California blackberry.
- Suitability for least Bell's vireo breeding territory: Due to a lack of a tiered vegetation structure, the habitat present is marginal breeding habitat for least Bell's vireo.
- Suitability for Southwestern willow flycatcher breeding territory: Due to a lack of a tiered vegetation structure and the narrow riparian corridor, the habitat present does not constitute suitable breeding habitat for southwestern willow flycatcher.

**Site 8 Browns Canyon Creek**  
Plant Species Observed within CDFG jurisdiction

Scientific Name	Common Name	Native
<i>Artemisia douglasiana</i>	Douglas mugwort	yes
<i>Epipactis giganteum</i>	Giant stream orchid	yes
<i>Quercus agrifolia</i>	Coast live oak	yes
<i>Rubus ursinus</i>	California blackberry	yes
<i>Salix lasiolepis</i>	Arroyo willow	yes
<i>Toxicodendron diversilobum</i>	Poison oak	yes
<i>Urtica dioica</i>	Stinging nettle	yes





**Photo 8-a:** Coast live oaks are the dominant canopy cover at Site 8. A colony of giant stream orchids occurs along the lower bank in the lower right of the photograph



**Photo 8-b:** A few arroyo willows are interspersed within the oak canopy. The understory is composed of California blackberry, poison oak, and Douglas mugwort.



**Photo 8-c:** Close up of the giant stream orchid



#### Site 9-Subtransmission Route

- Drainage characteristic: A lightly flowing perennial stream approximately 1 foot wide and 3 inches deep. Can possibly become ephemeral under drought conditions.
- Vegetation structure: Canopy dominated by arroyo willows and red willows with an intermittent Mexican elderberry. Understory not well developed
- Suitability for least Bell's vireo breeding territory: Due to the development constraints on each side of the riparian corridor (5 freeway and office complex), the habitat present constitutes marginal breeding habitat for least Bell's vireo.
- Suitability for Southwestern willow flycatcher breeding territory: Due to a lack of a tiered vegetation structure and the narrow riparian corridor confined by development on both sides, the habitat present does not constitute suitable breeding habitat for southwestern willow flycatcher.

**Site 9 Subtransmission Route**  
Plant Species Observed within CDFG jurisdiction

Scientific Name	Common Name	Native
<i>Polypogon monspeliensis</i>	Rabbits foot grass	no
<i>Salix laevigata</i>	Red willow	yes
<i>Salix lasiolepis</i>	Arroyo willow	yes
<i>Sambucus mexicana</i>	Mexican elderberry	yes



**Photo 9-a:** A view of the willow canopy overhanging the channel.



**Photo 9-b:** The sparse understory is composed primarily of woody debris.

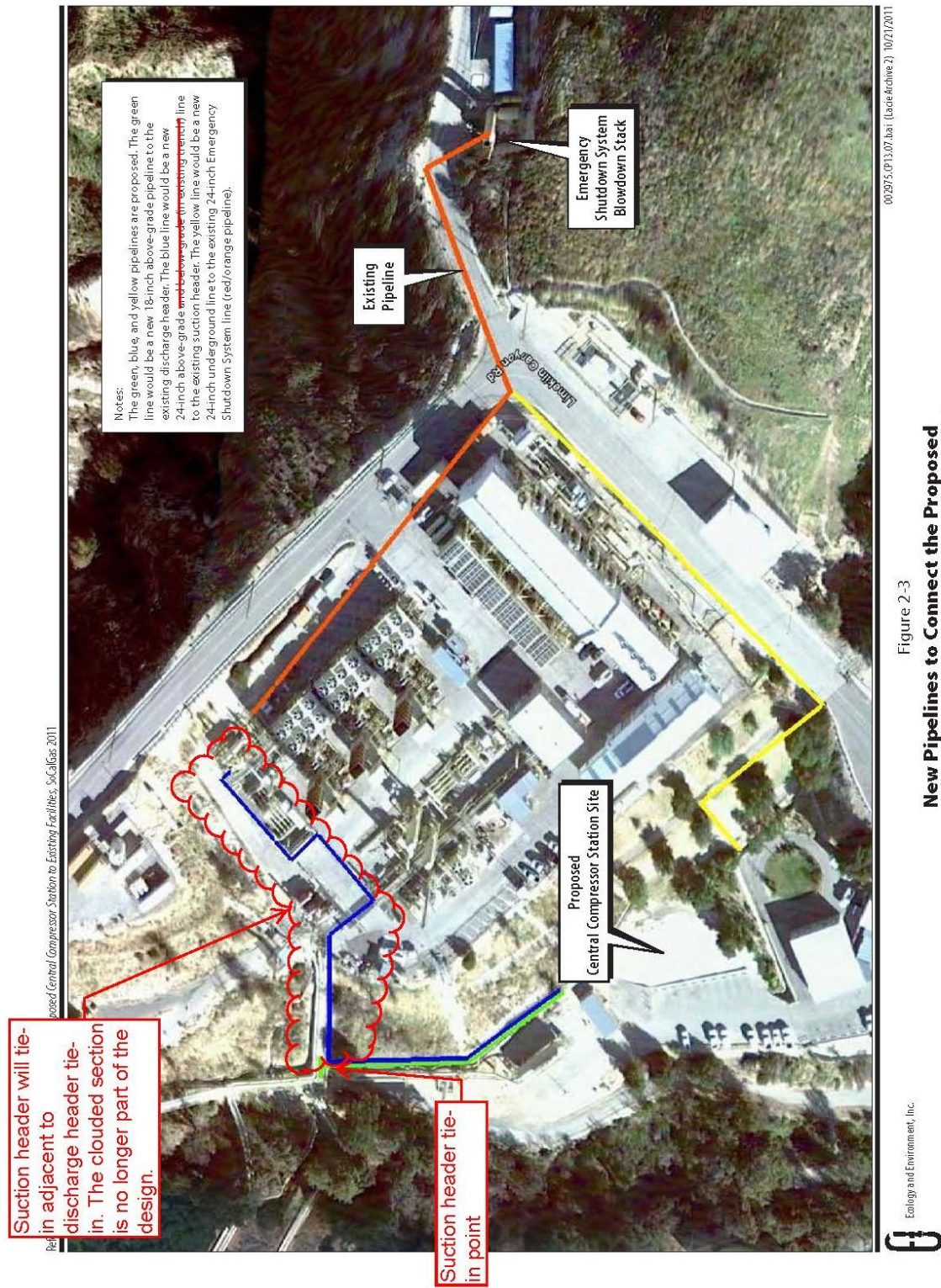


**Photo 9-c:** View looking towards the culvert and tower 14 (not pictured to the left of the culvert). A red willow and a Mexican elderberry is to the right.

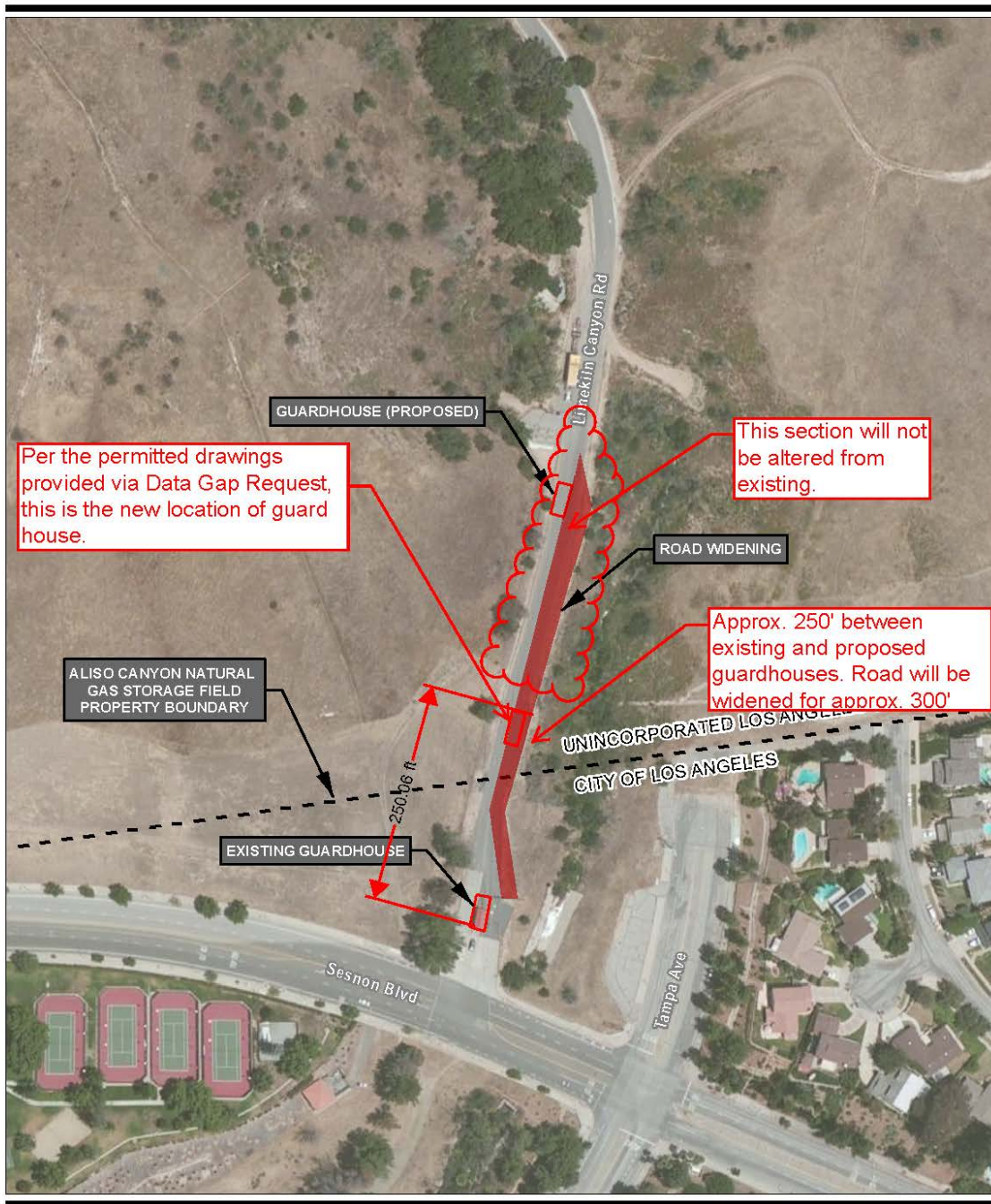
Comment O2-195  
refers to all Exhibit A-3

## EXHIBIT A-3









--- Aliso Canyon Natural Gas Storage  
Field Property Boundary

Figure 2-4  
Existing and Proposed Guardhouses

Comment O2-195  
refers to all Exhibit A-4

## EXHIBIT A-4

Exhibit A-4: Revised Table 2-7 Land Disturbance

Components of the Proposed Project	Acres of Disturbance	Length	Width	Acres Permanently Disturbed	Revision and Justification
<b>Proposed Project Facilities</b>					
<del>Proposed Central Compressor Station (Includes Site of Existing Office Facilities and Parking)</del>	<del>4.4</del>	—	—	4.4	The footprint of the proposed Central Compressor Station is estimated to be 1.4 acres, as provided in Data Request (DR) 10; however, the area is previously disturbed and does not represent temporary or new permanently disturbed acreage as a result of project implementation. This row should be deleted.
<del>Existing Compressor Station to be Decommissioned</del>	<del>4.4</del>	—	—	4.4	The footprint of existing facilities represents previously disturbed acres and would not result in temporary or new permanently disturbed acreage as a result of project implementation. This row should be deleted.
18-inch Pipeline to Discharge Header	0.5	550 feet	40 feet	0.1	Based on DR 11
24-inch Pipeline to Suction Header	0.5	550 feet	40 feet	0.1	Based on DR 11
24-inch Pipeline to Emergency Shutdown System	0.6	600 feet	40 feet	0.1	Based on DR 11
<del>Proposed Office Facilities and Parking</del>	<del>4.3</del>	—	—	4.3	The footprint of the proposed Office Facilities and Parking is estimated to be 1.3 acres, as provided in DR 10; however, the area is previously disturbed and does not represent temporary or new permanently disturbed acreage as a result of project implementation. This row should be deleted.
Proposed Guardhouse	0.02	—	—	0.02	Based on DR 10
12-kV Plant Power Line Route	1.1	<del>4,200</del> 1,800 feet	40 feet	—	Acres of Disturbance = 1.53 – Based on DR 10; Length = 1,800 feet – Based on DR 15
12-kV Plant Power Line TSPs (3)	1.4	200 feet	100 feet	0.2	Based on DR 15

Exhibit A-4: Revised Table 2-7 Land Disturbance

Components of the Proposed Project	Acres of Disturbance	Length	Width	Acres Permanently Disturbed	Revision and Justification
Natural Substation	1	300 feet	150 feet	1	Based on DR 10 (0.69)
Equipment/Structure Installations within Existing Substations	2-3	—	—	2-3	There are 4 proposed TSPs to be installed within and near the San Fernando Substation, two of the four TSPs would be located within the existing substation footprint and would not result in temporary or new land disturbance. The two TSPs that would be located near the substation are accounted for in the two rows below representative of 66-kV subtransmission line structure removal and TSPs. The impacts presented in this row are duplicative and should be deleted.
66-kV Subtransmission Line Structure Removal (64)	29	200 feet	100 feet	—	Based on DR 10
66-kV Subtransmission Line TSPs (78/14)	36-54	200 feet	100 feet	4-6-13	There are 14 new TSPs anticipated for installation (64 existing, and 78 proposed, per Table 2-2 of the DEIR). The impacts for TSP installation should be revised and based on new TSPs only. Areas where TSPs planned to replace existing structures are considered previously disturbed. Following construction, impacts would be restored to existing conditions.
Fiber Optic Cable Installation in New Underground Conduit	1.8	1,600 feet	50 feet <sup>d</sup>	—	No recommended revision
Fiber Optic Cable Installation on New Structures	Not Provided	—	—	Not Provided	No recommended revision
<b>Staging Areas</b>					
Wellhead Site P-42, Wellhead Site P-37, and Porter Fee Road Staging Areas near the Plant Station Site	8.9	—	—	8.9	The 8.9 acres of disturbance represents the total footprint area to be used for equipment staging, and was provided in DR 10; the area is currently disturbed and does not represent new impacts resulting from project implementation. This row should be deleted.



Exhibit A-4: Revised Table 2-7 Land Disturbance

Components of the Proposed Project	Acres of Disturbance	Length	Width	Acres Permanently Disturbed	Revision and Justification
Excess Excavated Soils Area (Wellhead P-32)	2.8	—	—	—	The 2.8 acres of disturbance represents the total footprint area to be used for soil processing, and was provided in DR 10; the area is currently disturbed and does not represent new impacts resulting from project implementation. This row should be deleted.
Natural Substation Staging Area (Wellheads P-40 and PS-42)/Alternate Natural Substation Staging Area/Fiber Optic Cable Installation Staging Area	3.7	—	—	—	The staging area proposed for Natural Substation construction activities is within a previously disturbed footprint and does not represent temporary or new disturbance impacts. This row should be deleted.
66-kV Subtransmission Line Staging Areas	Not Provided	—	—	—	--
Wire-pulling, Tensioning, and Splicing Sites for 66-kV Subtransmission Line Reconductoring (7) <sup>e, f</sup>	8.4	500 feet	100 feet	—	PEA, p.3-43, 44
Other Fiber Optic Cable Installation Staging Areas	Not Provided	—	—	—	No recommended revision
Wire-pulling, Tensioning, and Splicing Sites for Fiber Optic Cable Installations <sup>h</sup>	2.5	60 feet	100 feet	—	No recommended revision
<b>Roads</b>					
Storage Field Entry Road Widening <sup>i</sup>	0.2	500 feet	12 feet	0.2	No recommended revision
12-kV Plant Power Line TSP Access Road (1)	0.2	500 feet	18 feet	0.2	Consistent with DEIR Table 4.9-2
Natural Substation Access Road	0.6	1,500 feet	18 feet	0.6	Consistent with DEIR Table 4.9-2
66-kV Subtransmission Line	Not Provided	—	—	Not Provided	No recommended revision

Exhibit A-4: Revised Table 2-7 Land Disturbance

Components of the Proposed Project	Acres of Disturbance	Length	Width	Acres Permanently Disturbed	Revision and Justification
Reconductoring Access Roads					
Fiber Optic Cable Installation Access Roads	Not Provided	—	—	Not Provided	No recommended revision
<b>Total</b>	<del>406</del> <u>47.9</u> acres	—	—	<del>22</del> <u>2.5</u> acres	Revise total acreages to accurately present potential land disturbance due to project implementation

Comment O2-197  
refers to all Exhibit A-5

## EXHIBIT A-5

**Exhibit A-5 – Revised Noise Assessment for Fiber Optic Installation/Telecom Construction**  
**Activities**

The use of pole replacement and placement noise levels for the installation of telecommunication lines is inappropriate. The removal and installation of poles is largely driven by large cranes, auger trucks, cement mixers, and jackhammers and is used as the basis of determining noise impacts in the ACTR DEIR as these are loudest pieces of equipment associated with these activities.

Telecom line installation typically involves the use of spool trucks and boom-lift, or man lift, trucks. Typically, the spool truck would be located at a single location for the majority of a single installation and is idling or sitting with the engine off the majority of the time. The boom truck moves from pole to pole to lift the technician to the top of the pole to install equipment and string the telecom line. The actual time spent at each pole is short-term and typically involves less than half an hour at any single pole.

Based on this scenario, noise levels from the simultaneous operation of both pieces of equipment is estimated to generate an hourly average noise level at 50 feet of 72 dBA  $L_{eq}$ . Individually the boom truck is estimated to generate 68 dBA  $L_{eq}$  at 50 feet and the spool truck is estimated to generate 70 dBA  $L_{eq}$  at 50 feet. Noise levels are modeled using the Federal Highway Administration's Road Construction Noise Model (RCNM) (FHWA 2006). RCNM does not include spool trucks so a flat bed truck was used in the model, which assumes the truck is operational at full power approximately 40 percent of an hour and is thus considered a conservative replacement for the spool truck. Based on the calculated noise levels telecom line installation is not anticipated to exceed local standards or result in substantial noise level increase at adjacent properties.

Noise modeling results presented in Attachment 1.

Federal Highway Administration (FHWA)

2006 Road Construction Noise Model, version 1.00. January.

Roadway Construction Noise Model (RCNM), Version 1.0  
Telecom Line

Report date:  
Case Description:

04/26/2012

\*\*\*\* Receptor #1 \*\*\*\*

Description	Land Use	Daytime	Baselines (dBA)		Receptor Distance (feet)	Estimated Shielding (dBA)
			Evening	Night		
Unknown	Residential	50.0	40.0	40.0	50.0	0.0

Description	Impact Device	Usage (%)	Equipment		Receptor Distance (feet)	Estimated Shielding (dBA)
			Spec Lmax (dBA)	Actual Lmax (dBA)		
Man Lift	No	20		74.7	50.0	0.0
Flat Bed Truck	No	40		74.3	50.0	0.0

Results

Equipment	Calculated (dBA)	
	Lmax	Leq
Man Lift	74.7	67.7
Flat Bed Truck	74.3	70.3
Total	74.7	72.2

Comment O2-198  
refers to all Exhibit A-6

## EXHIBIT A-6

Exhibit A-6: Revised Table 5.1. Comparison of Alternatives to the Proposed Project (Adverse Environmental Impacts by Resource Area)

Resource Area	Proposed Project (Impact Determination)	Impact Type	Design Alternative (Alternative Compressor Drive Type)	Routing Alternative A (Telecom: Sylmar Substation to San Fernando Substation)	No Project Alternative	Environmentally Superior Alternative
Aesthetics	Less than significant	Temporary	Less	Similar	Less	Design Alternative
Agriculture and Forestry Resources <sup>1</sup>	No Impact <del>Less than significant</del>	No Impact Temporary	<u>Similar-Less</u>	Similar	<u>Similar-Less</u>	<u>Proposed Project Design Alternative</u>
Air Quality <sup>2</sup>	Less than significant <i>with mitigation</i>	Long Term	<u>Substantially Greater</u>	Similar	<u>Substantially Greater</u>	Proposed Project
Biological Resources	Less than significant <i>with mitigation</i>	Temporary, long term	Less	Similar	Less	Design Alternative
Cultural and Paleontological Resources	Less than significant <i>with mitigation</i>	Temporary	Less	Similar	Less	Design Alternative
Geology, Soils, and Mineral Resources	Less than significant	Temporary, long term	<u>Similar-Less</u>	Similar	Less	<u>Proposed Project Design Alternative</u>
Greenhouse Gas Emissions <sup>3</sup>	Less than significant	Long Term	<u>Substantially Greater</u>	Similar	<u>Substantially Greater</u>	Proposed Project
Hazards and Hazardous Materials <sup>4</sup>	Less than significant <i>with mitigation</i>	Temporary, Long Term	<u>Greater Less</u>	Similar	<u>Greater Less</u>	<u>Proposed Project Design Alternative</u>
Hydrology and Water Quality	Less than significant	Temporary, long term	Less	Similar	Less	Design Alternative
Land Use and Planning <sup>5</sup>	No Impact <del>Less than significant</del>	No Impact Temporary	<u>Similar-Less</u>	Similar	<u>Similar-Less</u>	<u>Proposed Project Design Alternative</u>
Noise	Less than significant <i>with mitigation</i>	Temporary	Less	Less	Less	Design Alternative

Exhibit A-6: Revised Table 5.1. Comparison of Alternatives to the Proposed Project (Adverse Environmental Impacts by Resource Area)

Resource Area	Proposed Project (Impact Determination)	Impact Type	Design Alternative (Alternative Compressor Drive Type)	Routing Alternative A (Telecom: Sylmar Substation to San Fernando Substation)	No Project Alternative	Environmentally Superior Alternative
Population and Housing <sup>6</sup>	No Impact <del>Less than significant</del>	No Impact <del>Temporary</del>	<del>Similar-Less</del>	Similar	<del>Similar-Less</del>	<del>Proposed Project Design Alternative</del>
Public Services and Utilities	Less than significant	Temporary	Less	Similar	Less	Design Alternative
Recreation <sup>7</sup>	No Impact <del>Less than significant</del>	No Impact <del>Temporary</del>	<del>Similar-Less</del>	Similar	<del>Similar-Less</del>	<del>Proposed Project Design Alternative</del>
Transportation and Traffic	Less than significant	Temporary	Less	Similar	Greater	Design Alternative
Cumulative	Less than significant	Temporary, long term	Greater	Similar	Greater	Proposed Project
Growth Inducing <sup>8</sup>	No Impact <del>Less than significant</del>	No Impact <del>Temporary</del>	<del>Similar-Less</del>	Similar	<del>Similar-Less</del>	<del>Proposed Project Design Alternative</del>

Notes:

1. See Master Comment Table, comment 82 for supporting analysis and further clarification.
2. See Master Comment Table, comment 150 for supporting analysis and further clarification.
3. See Master Comment Table, comments 151 for supporting analysis and further clarification.
4. See Master Comment Table, comments 153 for supporting analysis and further clarification.
5. See Master Comment Table, comments 137 for supporting analysis and further clarification.
6. See Master Comment Table, comments 155, 157-159 for supporting analysis and further clarification.
7. See Master Comment Table, comments 155, 157-159 for supporting analysis and further clarification.
8. See Master Comment Table, comments 155, 157-159 for supporting analysis and further clarification.



**O2 Southern California Gas Company, 5/22/2012**

- O2-1:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project.
- O2-2:** Refer to Master Response to Comments About the Environmentally Superior Alternative and Master Response to Comments About CEQA Significance Determinations (No Impact Versus Less Than Significant Impact) regarding selection of the Environmentally Superior Alternative and impact significance determinations presented in the Draft EIR.
- O2-3:** Refer to Master Response to Comments About the Environmentally Superior Alternative and Master Response to Comments About CEQA Significance Determinations (No Impact Versus Less Than Significant Impact) regarding selection of the Environmentally Superior Alternative and impact significance determinations presented in the Draft EIR.
- O2-4:** Refer to Master Response to Comments About CEQA Significance Determinations (No Impact Versus Less Than Significant Impact) regarding impact significance determinations. The analysis presented in Draft EIR Section 4.14, "Recreation," is discussed in this master response.
- O2-5:** Refer to Master Response to Comments About CEQA Significance Determinations (No Impact Versus Less Than Significant Impact) regarding impact significance determinations. The analysis presented in Draft EIR Section 4.14, "Recreation," is discussed in this master response.
- O2-6:** Refer to Master Response to Comments About CEQA Significance Determinations (No Impact Versus Less Than Significant Impact) regarding impact significance determinations. The analysis presented in Draft EIR Section 4.14, "Recreation," is discussed in this master response.
- O2-7:** Refer to Master Response to Comments Addressing CEQA Significance Determinations (No Impact Versus Less Than Significant Impact) regarding impact significance determinations. The analysis presented in Draft EIR Section 4.14, "Recreation," is discussed in this master response.
- O2-8:** Refer to Master Response to Comments About CEQA Significance Determinations (No Impact Versus Less Than Significant Impact) regarding impact significance determinations.
- O2-9:** Refer to revisions made to EIR Section 4.3, "Air Quality," as presented in Appendix A of this Final EIR. Revisions were made to Mitigation Measure AQ-3 (formerly Mitigation Measure AQ-1) to include both RTCs and MSERCs.
- O2-10:** Refer to response to comment O2-9.
- O2-11:** Some of the APMs initially proposed by the applicant in the PEA for the Aliso Canyon project contained language that would have made the measures difficult to measure or enforce. For example, the PEA included the following APM addressing project impacts to wildlife: "Special-status wildlife in-harm's way may be relocated to native habitat near the

- work area but outside the impact zone in order to avoid injury or mortality.” This APM is not enforceable because it does not clearly specify that only specially qualified biologists authorized by the U.S. Fish and Wildlife Service (USFWS) or California Department of Fish and Wildlife (CDFW), usually through a species-specific permit, may handle certain special-status species; in addition, the language of this APM (“may”) suggests that this measure would be optional rather than mandatory, and does not specify under what conditions the measure would be implemented. In August and October 2011, during preparation of the Draft EIR, the CPUC proposed revisions to the language of the APMs to eliminate redundancies and make the language more specific, so the APMs would be feasible and capable of being monitored. The CPUC shared and discussed these revisions with the applicant and SCE, who agreed to most of the revisions. If the applicant or SCE objected to the revisions to an APM, the CPUC deleted that APM from the project description and added it to the relevant environmental impact discussion as a mitigation measure (for example, APM BR-08, which addressed impacts to Plummer’s mariposa lily, was “converted” into Mitigation Measure BR-12). Because the applicant and SCE believe that some APMs have been revised such that they are no longer “applicant proposed measures,” these measures as identified by the applicant and SCE in their comment letters have been deleted from Table 2-9 in EIR Chapter 2, Project Description, added as mitigation measures to the relevant resource topic sections.
- O2-12:** Refer to revisions made to EIR Section 4.4, “Biological Resources,” as presented in Appendix A of this Final EIR. Refer to Mitigation Measure BR-15 for mitigation related to oak tree trimming and removal, and response to comment O1-11.
- O2-13:** Refer to revisions made to EIR Section 4.4, “Biological Resources,” as presented in Appendix A of this Final EIR. Refer to Mitigation Measure BR-15 for mitigation related to oak tree trimming and removal, and response to comment O1-11.
- O2-14:** Revisions have been made throughout the EIR to include this information. Refer to these revisions as presented in Appendix A of the Final EIR.
- O2-15:** Refer to revisions made to the Executive Summary of the EIR as presented in Appendix A of this Final EIR.
- O2-16:** Refer to revisions made to the Executive Summary of the EIR as presented in Appendix A of this Final EIR.
- O2-17:** Refer to revisions made to the Executive Summary of the EIR as presented in Appendix A of this Final EIR.
- O2-18:** Refer to revisions made to the Executive Summary of the EIR as presented in Appendix A of this Final EIR.
- O2-19:** Refer to revisions made to the Executive Summary of the EIR and Figure E-1 as presented in Appendix A of this Final EIR.
- O2-20:** Refer to revisions made to the Executive Summary of the EIR as presented in Appendix A of this Final EIR. This global change has also been made throughout the EIR.

- O2-21:** Refer to revisions made to the Executive Summary of the EIR as presented in Appendix A of this Final EIR.
- O2-22:** No revision is required. The term “project area” is specified as needed in each resource topic area section in Chapter 4 of the EIR.
- O2-23:** No revision is required. The term “Areas of Potential Concern” is not a term found in CEQA statute or the CEQA Guidelines. CEQA Guidelines Section 15123 requires an EIR to contain a brief summary of the proposed project and its environmental impacts, and within this summary to identify “Areas of controversy known to the Lead Agency including issues raised by agencies and the public.” The term “areas of controversy” is not defined in the CEQA Guidelines. Merriam-Webster’s Collegiate Dictionary defines “controversy” as “a discussion marked especially by the expression of opposing views.”

The summary of areas of controversy in an EIR represents an opportunity for the lead agency to fulfill one of the main policies of CEQA: that of providing a “good-faith effort at disclosure” (CEQA Guidelines Section 15003(i)) regarding the nature of the impacts that would be caused by the project. For the purpose of this EIR, areas of controversy include topics and issues that were raised by the public and agencies during scoping or public review of the EIR, and may also be topics about which one or more public comments on the Draft EIR differed. For example, some public comments addressed the need for an additional project alternative whereby the 66-kV subtransmission lines would be relocated underground; other comments expressed concern that such an alternative would not be financially feasible. As such, these “areas of controversy” were topics relevant to the analysis of project impacts to that resource. Although only a short section in a summary, the identification of areas of controversy in this EIR focuses the reader on topics that may have been the subject of conflicting opinions or statements at some point during the analysis.

- O2-24:** Refer to Master Response to Comments About CEQA Significance Determinations (No Impact Versus Less Than Significant Impact).
- O2-25:** Refer to response to comment O2-9.
- O2-26:** Refer to revisions made to the Executive Summary of the EIR and Section 4.4, “Biological Resources,” as presented in Appendix A of this Final EIR. Both the Least Bell’s Vireo (LBV) and Southwestern Willow Flycatcher (SWF) survey protocols (USFWS 2001 and Sogge et al. 2010, respectively) provide general characteristics of habitat suitable to support breeding for the species. However, neither of these protocols specifically occlude certain types of riparian and associated upland habitat, as LBV and SWF can utilize marginal non-traditional habitats due to significant reductions of optimal habitat within their current ranges. Scientific literature (Kus and Miner 1989, Unitt 2004) addresses this issue with regard to LBV habitat, and there is evidence of LBV also using non-willow tree/shrub species, including coastal live oak, blackberry, rose and poison oak (Kus et al. 2010). The applicant’s habitat assessment for the SWF provided in Exhibit A-1 contains evidence to address SWF; however, it does not include evidence that these areas within the project boundary fail to provide suitable or marginal (i.e., potentially suitable) habitat for the LBV. Revisions were made to the text of Mitigation Measure BR-9 (formerly Mitigation Measure BR-8), as appropriate.

- O2-27:** Refer to revisions made to EIR Section 4.4, “Biological Resources,” including Mitigation Measure BR-12, as presented in Appendix A of this Final EIR.
- O2-28:** Refer to revisions made to EIR Section 4.4, “Biological Resources,” including Mitigation Measure BR-13 (formerly Mitigation Measure BR-11), as presented in Appendix A of this Final EIR.
- O2-29:** Refer to revisions made to EIR Section 4.4, “Biological Resources,” including Mitigation Measure BR-14 (formerly Mitigation Measure BR-12), as presented in Appendix A of this Final EIR.
- O2-30:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR.
- O2-31:** Refer to revisions made to EIR Chapter 2, “Project Description,” and Section 4.8, “Hazards and Hazardous Materials.” APM HZ-8 has been removed from Table 2-9 in Chapter 2, and has been converted to Mitigation Measure HZ-2, in Section 4.8. The requirement to maintain one shovel and one pressurized chemical fire extinguisher for each gasoline-powered tool is not infeasible, and would reduce the risk of fire hazards during project construction.
- O2-32:** Refer to revisions made to EIR Chapter 1, “Introduction,” as presented in Appendix A of this Final EIR. Chapter 1 correctly describes the project as being located in unincorporated Los Angeles County and the City of Los Angeles.
- O2-33:** Refer to revisions made to EIR Chapter 1, “Introduction,” as presented in Appendix A of this Final EIR.
- O2-34:** Refer to revisions made to EIR Chapter 1, “Introduction,” as presented in Appendix A of this Final EIR.
- O2-35:** Refer to revisions made to EIR Chapter 1, “Introduction,” as presented in Appendix A of this Final EIR.
- O2-36:** Refer to revisions made to EIR Section 1.3, “CPUC Process and Intended Uses of the EIR,” as presented in Appendix A of this Final EIR. As of the date of this document, it is unknown what changes, if any, might be required for the proposed project. If the EIR is certified and, after certification, the applicant or SCE propose changes to the project, the CPUC will determine at that time whether additional analysis or measures (including additional analysis pursuant to CEQA) are required for such changes.
- O2-37:** Refer to revisions made to EIR Chapter 2.0, “Project Description,” as presented in Appendix A of this Final EIR. This global change has also been made throughout the EIR.
- O2-38:** Refer to revisions made to EIR Chapter 2.0, “Project Description,” as presented in Appendix A of this Final EIR. This global change has also been made throughout the EIR.
- O2-39:** Refer to revisions made to EIR Chapter 2.0, “Project Description,” as presented in Appendix A of this Final EIR.

- O2-40:** Refer to revisions made to EIR Chapter 2.0, "Project Description," including Figure 2-3, as presented in Appendix A of this Final EIR.
- O2-41:** Refer to revisions made to EIR Chapter 2.0, "Project Description," including Figure 2-4, as presented in Appendix A of this Final EIR.
- O2-42:** Refer to revisions made to EIR Chapter 2.0, "Project Description," as presented in Appendix A of this Final EIR.
- O2-43:** Refer to revisions made to EIR Chapter 2.0, "Project Description," as presented in Appendix A of this Final EIR.
- O2-44:** Refer to revisions made to EIR Chapter 2.0, "Project Description," as presented in Appendix A of this Final EIR.
- O2-45:** Refer to revisions made to EIR Chapter 2.0, "Project Description," as presented in Appendix A of this Final EIR.
- O2-46:** No revision is required. The project area includes the storage field as well as other locations in which project elements would be constructed.
- O2-47:** Refer to revisions made to EIR Chapter 2.0, "Project Description," as presented in Appendix A of this Final EIR.
- O2-48:** Refer to revisions made to EIR Chapter 2.0, "Project Description," as presented in Appendix A of this Final EIR.
- O2-49:** Refer to revisions made to EIR Chapter 2.0, "Project Description," as presented in Appendix A of this Final EIR.
- O2-50:** Refer to revisions made to EIR Chapter 2.0, "Project Description," as presented in Appendix A of this Final EIR.
- O2-51:** Refer to revisions made to EIR Chapter 2.0, "Project Description," as presented in Appendix A of this Final EIR.
- O2-52:** Refer to revisions made to EIR Chapter 2.0, "Project Description," as presented in Appendix A of this Final EIR.
- O2-53:** Refer to revisions made to EIR Chapter 2.0, "Project Description," as presented in Appendix A of this Final EIR.
- O2-54:** Refer to revisions made to EIR Chapter 2.0, "Project Description," as presented in Appendix A of this Final EIR.

- O2-55:** Refer to revisions made to EIR Chapter 2.0, “Project Description,” as presented in Appendix A of this Final EIR. Per comment O2-195, the entry road leading to the guardhouse would be widened for approximately 300 feet.
- O2-56:** Refer to revisions made to EIR Chapter 2.0, “Project Description,” as presented in Appendix A of this Final EIR.
- O2-57:** Refer to revisions made to EIR Chapter 2.0, “Project Description,” as presented in Appendix A of this Final EIR.
- O2-58:** Refer to revisions made to EIR Chapter 2.0, “Project Description,” as presented in Appendix A of this Final EIR.
- O2-59:** Refer to revisions made to EIR Chapter 2.0, “Project Description,” as presented in Appendix A of this Final EIR.
- O2-60:** Refer to revisions made to EIR Chapter 2.0, “Project Description,” as presented in Appendix A of this Final EIR. These revisions include the assumption that construction is anticipated to start in October 2013.
- O2-61:** Refer to revisions made to EIR Chapter 2.0, “Project Description,” as presented in Appendix A of this Final EIR, and refer to response to comment O2-60.
- O2-62:** No revision is required. CEQA requires the evaluation of physical changes in the environment that may be caused by the project. Examples of physical changes in the environment include but are not limited to dust, noise, and heavy equipment traffic that would result from construction activities (CEQA Guidelines Section 15064(d)(1)). Construction of the proposed Central Compressor Station would result in a direct physical change in the environment. Although parts of the proposed Central Compressor Station site and other sites at the Aliso Canyon Natural Gas Storage Field facility site are already developed, additional physical changes to the sites would occur as part of the proposed project. The proposed Central Compressor Station would likely be in service for at least 25 years. Therefore, it is assumed that its construction would result in a permanent (i.e., long-term) physical change to the site. The proposed office facilities, parking areas, and other facilities at the Aliso Canyon Natural Gas Storage Field facility site would also result in direct physical changes. By comparison, as described in this EIR, temporary (i.e., short term) physical changes are those that would conclude at the end of construction of the proposed project components, but nonetheless represent physical disturbance that is required to be evaluated per the requirements of CEQA.
- O2-63:** Refer to revisions made to EIR Section 1.3, “CPUC Process and Intended Uses of the EIR,” as presented in Appendix A of this Final EIR. As of the date of this document, it is unknown what changes, if any, might be required for the proposed project. If the EIR is certified and, after certification, the applicant or SCE propose changes to the project, the CPUC will determine at that time whether additional analysis or measures (including additional analysis pursuant to CEQA) are required for such changes.

- O2-64:** The sentence in EIR Chapter 2.0, “Project Description” referenced in this comment does not appear under the heading 2.3.3.7, Hazardous Waste; rather, it is (appropriately) under the heading 2.3.3.6, Nonhazardous Waste. Some of the excavated soil from trenching required by the project might not be suitable for on-site reuse for other purposes, and it could require off-site disposal at an appropriate facility. This sentence has been revised to reflect the actual length of trenching (3,360 feet) that would be required.
- O2-65:** Refer to response to comment O2-55.
- O2-66:** Refer to revisions made to EIR Chapter 2.0, “Project Description,” as presented in Appendix A of this Final EIR.
- O2-67:** Refer to revisions made to EIR Chapter 2.0, “Project Description,” as presented in Appendix A of this Final EIR.
- O2-68:** Refer to revisions made to EIR Chapter 2.0, “Project Description,” as presented in Appendix A of this Final EIR.
- O2-69:** Refer to revisions made to EIR Chapter 2.0, “Project Description,” as presented in Appendix A of this Final EIR.
- O2-70:** Refer to revisions made to EIR Chapter 2.0, “Project Description,” as presented in Appendix A of this Final EIR.
- O2-71:** Refer to revisions made to EIR Chapter 2.0, “Project Description,” as presented in Appendix A of this Final EIR.
- O2-72:** Refer to revisions made to EIR Chapter 2.0, “Project Description,” including APM AQ-5 in Table 2-9, as presented in Appendix A of this Final EIR.
- O2-73:** Refer to revisions made to EIR Chapter 2.0, “Project Description,” including APM AQ-6 in Table 2-9, as presented in Appendix A of this Final EIR.
- O2-74:** Refer to revisions made to EIR Chapter 2.0, “Project Description,” as presented in Appendix A of this Final EIR. Revisions to APM BR-1 per the comment have been made in Table 2-9.
- O2-75:** Refer to revisions made to EIR Chapter 2.0, “Project Description,” as presented in Appendix A of this Final EIR.
- O2-76:** Refer to revisions made to EIR Chapter 2.0, “Project Description,” and Section 4.4, “Biological Resources” as presented in Appendix A of this Final EIR. The proposed edits to the APM would not address all wildlife entrapment situations and would not be adequately protective; therefore, this APM has been converted to Mitigation Measure BR-11.
- O2-77:** Mitigation Measure BR-15 has been renamed “Restoration of Native Oak Trees” and addresses this comment by adding a requirement for the applicant and SCE to mitigate losses and impacts to oak trees. Refer also to response to comment O1-11.

- O2-78:** Refer to revisions made to EIR Chapter 2.0, "Project Description," as presented in Appendix A of this Final EIR.
- O2-79:** Refer to revisions made to EIR Chapter 2.0, "Project Description," as presented in Appendix A of this Final EIR.
- O2-80:** Refer to revisions made to EIR Chapter 3.0, "Description of Alternatives," as presented in Appendix A of this Final EIR. Figure 3-1 has been revised.
- O2-81:** Refer to revisions made to EIR Section 4.1, "Aesthetics," as presented in Appendix A of this Final EIR.
- O2-82:** Refer to revisions made to EIR Section 4.1, "Aesthetics," including Figure 4.1-1, as presented in Appendix A of this Final EIR.
- O2-83:** Refer to revisions made to EIR Section 4.1, "Aesthetics," as presented in Appendix A of this Final EIR.
- O2-84:** Refer to revisions made to EIR Section 4.1, "Aesthetics," as presented in Appendix A of this Final EIR.
- O2-85:** Refer to revisions made to EIR Section 4.1, "Aesthetics," as presented in Appendix A of this Final EIR.
- O2-86:** Refer to revisions made to EIR Section 4.1, "Aesthetics," including Figure 4.1-2, as presented in Appendix A of this Final EIR.
- O2-87:** Refer to revisions made to EIR Section 4.1, "Aesthetics," as presented in Appendix A of this Final EIR.
- O2-88:** Refer to revisions made to EIR Section 4.1, "Aesthetics," as presented in Appendix A of this Final EIR.
- O2-89:** Refer to revisions made to EIR Section 4.1, "Aesthetics," as presented in Appendix A of this Final EIR.
- O2-90:** Refer to revisions made to EIR Section 4.1, "Aesthetics," including Figure 4.1-4, as presented in Appendix A of this Final EIR.
- O2-91:** Refer to revisions made to EIR Section 4.1, "Aesthetics," including Figure 4.1-5, as presented in Appendix A of this Final EIR.
- O2-92:** Refer to revisions made to EIR Section 4.1, "Aesthetics," including Figure 4.1-6, as presented in Appendix A of this Final EIR.
- O2-93:** Refer to revisions made to EIR Section 4.1, "Aesthetics," as presented in Appendix A of this Final EIR.



- O2-94:** Refer to revisions made to EIR Section 4.1, “Aesthetics,” as presented in Appendix A of this Final EIR.
- O2-95:** Refer to revisions made to EIR Section 4.2, “Agriculture and Forestry Resources,” as presented in Appendix A of this Final EIR. Also refer to response to comment O1-11.
- O2-96:** No revision is required. Impact AG-2 describes a conservative estimate of the number of acres of zoned agricultural land that could be affected by the project, but indicates that the land is within an existing ROW and is not used for active agricultural production. Therefore, the impact determination is accurate as stated. Also refer to response to comment O2-62.
- O2-97:** The applicant has provided revised air emissions calculations to include (a) the additional emissions associated with Telecom Route #4; (b) the quantity of emissions that would take place in Ventura County; and (c) the quantity of additional emissions that would be generated related to travel on unpaved roads. This information is presented in Appendix B, and has been summarized and added to the evaluation in EIR Section 4.3, “Air Quality,” as presented in Appendix A of this Final EIR.
- O2-98:** Refer to revisions made to EIR Section 4.3, “Air Quality,” as presented in Appendix A of this Final EIR. Revisions were made to this section to include and evaluate fugitive dust emissions, as appropriate. In addition, Section 4.3.4, Overview of Construction Impacts, was revised to clarify which roads would be paved.
- O2-99:** Refer to revisions made to EIR Section 4.3, “Air Quality,” as presented in Appendix A of this Final EIR. Revisions were made to Table 4.3-6 (now Table 4.3-7) to include this information.
- O2-100:** Refer to response to comment O2-9.
- O2-101:** Refer to revisions made to EIR Section 4.3, “Air Quality,” as presented in Appendix A of this Final EIR.
- O2-102:** Refer to revisions made to EIR Section 4.4, “Biological Resources,” as presented in Appendix A of this Final EIR.
- O2-103:** Refer to revisions made to EIR Section 4.4, “Biological Resources,” as presented in Appendix A of this Final EIR.
- O2-104:** Refer to revisions made to EIR Section 4.4, “Biological Resources,” as presented in Appendix A of this Final EIR.
- O2-105:** No revision is required. The applicant did not conduct wetland investigations or delineations for Telecommunications Route #2, and it is currently unknown whether wetlands (including vernal pools, which by their nature are usually small and ephemeral and thus require on-site fine-scale surveys) are present within the project boundary for Telecommunications Route #2. California Orcutt grass could occur if vernal pools are present in the area.

- O2-106:** No revision is required. The coastal California gnatcatcher is listed as a Species of Special Concern in California, over which the CDFW (formerly CDFG) has regulatory oversight; therefore, it is appropriate and necessary for the applicant to confer with both the USFWS and CDFW regarding this species.
- O2-107:** Refer to revisions made to EIR Section 4.4, “Biological Resources,” as presented in Appendix A of this Final EIR. Revisions were made to Table 4.4-3 to include this information, as follows: Unlikely = Occurrence of this species has been identified in the California Natural Diversity Database (CNDDDB) records, but either the recorded observations are more than 10 years old; key habitat requirements are absent; or the habitat in the proposed project study area is so degraded, small, or isolated that it would be very unlikely for individuals of the species to colonize or use the area. Likely = Per CNDDDB and/or professional expertise specific to the proposed project study area, individuals of the species are likely to colonize or use the area, because data show that individuals of the species are known to occur within 5 miles of the proposed project study area and there is ideal habitat within the proposed project study area.
- O2-108:** Refer to revisions made to EIR Section 4.3, “Biological Resources,” as presented in Appendix A of this Final EIR.
- O2-109:** No revision is required. Although some habitat requirements (i.e., elevation) are missing, a historic CNDDDB occurrence of this species was recorded near the project area. Per the above definitions (response to comment O2-107), the Potential to Occur for this species is determined to be “unlikely.”
- O2-110:** No revision is required. Discussions and consultation with the USFWS and CDFW initiated by the CPUC (September 27, 2011 phone conference) established that California condors are known to be present in the area.
- O2-111:** No revision is required. Refer to responses to comments O2-26 and O2-107.
- O2-112:** Refer to revisions made to EIR Section 4.3, “Biological Resources,” as presented in Appendix A of this Final EIR. Also refer to response to comment O2-26.
- O2-113:** Refer to revisions made to EIR Section 4.3, “Biological Resources,” as presented in Appendix A of this Final EIR.
- O2-114:** Refer to revisions made to EIR Section 4.3, “Biological Resources,” as presented in Appendix A of this Final EIR.
- O2-115:** Refer to revisions made to EIR Section 4.3, “Biological Resources,” as presented in Appendix A of this Final EIR.
- O2-116:** Refer to revisions made to EIR Section 4.3, “Biological Resources,” as presented in Appendix A of this Final EIR. Revisions were made to Mitigation Measure BR-3 to include the applicant as well as SCE in the measure. Also refer to response to Comment O2-106.

- O2-117:** Refer to revisions made to EIR Section 4.3, “Biological Resources,” as presented in Appendix A of this Final EIR. Also refer to response to Comment O2-26.
- O2-118:** Refer to revisions made to EIR Section 4.5, “Cultural Resources,” as presented in Appendix A of this Final EIR.
- O2-119:** Refer to revisions made to EIR Section 4.5, “Cultural Resources,” as presented in Appendix A of this Final EIR.
- O2-120:** Refer to revisions made to EIR Section 4.5, “Cultural Resources,” as presented in Appendix A of this Final EIR. Revisions were made to this section to include replacing the term “Area of Potential Effect (APE)” with the terms “project area” or “survey area,” as appropriate.
- O2-121:** Refer to revisions made to EIR Section 4.5, “Cultural Resources,” as presented in Appendix A of this Final EIR.
- O2-122:** No revisions are required. Public Resources Code Section 5097.98 (e) describes procedures to be followed in the event that a descendant cannot be identified, the descendants fail to make a recommendation, or the landowner rejects the descendants’ recommendation.
- O2-123:** Refer to revisions made to EIR Section 4.5, “Cultural Resources,” as presented in Appendix A of this Final EIR. Revisions were made to this section to include the following information: based on data collected from the records search and surveys, historical resources have been documented within the project area, cultural resources surveys have not been conducted for some areas of the proposed project, and previously unrecorded historical resources may be present; therefore, construction activities could impact unknown historical resources.
- O2-124:** Refer to revisions made to EIR Section 4.5, “Cultural Resources,” as presented in Appendix A of this Final EIR.
- O2-125:** Refer to revisions made to EIR Section 4.5, “Cultural Resources,” as presented in Appendix A of this Final EIR.
- O2-126:** Refer to revisions made to EIR Section 4.5, “Cultural Resources,” as presented in Appendix A of this Final EIR.
- O2-127:** Refer to revisions made to EIR Section 4.5, “Cultural Resources,” as presented in Appendix A of this Final EIR.
- O2-128:** Refer to revisions made to EIR Section 4.5, “Cultural Resources,” as presented in Appendix A of this Final EIR. Revisions were made to this section to change the title of Mitigation Measure CR-7 to Paleontological Sensitivity Training. The mitigation measure was retained in order to provide a specific measure addressing paleontological sensitivity training for construction personnel.
- O2-129:** Refer to response to comment O2-128.

- O2-130:** Refer to revisions made to EIR Section 4.5, “Cultural Resources,” as presented in Appendix A of this Final EIR. Refer to response to comment O2-128, regarding Mitigation Measure CR-7. Other suggested revisions to this section have been completed.
- O2-131:** Refer to revisions made to EIR Section 4.5, “Cultural Resources,” as presented in Appendix A of this Final EIR. Refer to response to comment O2-128, regarding Mitigation Measure CR-7. Other suggested revisions to this section have been completed.
- O2-132:** Refer to response to comment O2-128.
- O2-133:** Refer to revisions made to EIR Section 4.6, “Geology, Soils and Mineral Resources,” as presented in Appendix A of this Final EIR. Impacts related to potential subsidence in the area of all project components would be addressed through the implementation of site-specific geotechnical recommendations, as described in subsection 4.6.5.2, Impacts Analysis.
- O2-134:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR.
- O2-135:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR.
- O2-136:** Refer to the Master Response to Comments Regarding CEQA Significance Determinations (No Impact Versus Less Than Significant Impact).
- O2-137:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR. Also refer to response to comment A3-20.
- O2-138:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR.
- O2-139:** No revision is required. In EIR Section 4.9, “Hydrology and Water Quality,” subsection 4.9.4 refers to activities that may be required for construction of the SCE components, including Telecommunications Route #2. Telecommunications Route #2 will require some grading and site disturbance and may result in impacts to hydrology and water quality, and is addressed in the analysis of Impact HY-2 as well as in discussions of hydrological impacts that address all project components.
- O2-140:** Refer to revisions made to EIR Section 4.9, “Hydrology and Water Quality,” as presented in Appendix A of this Final EIR.
- O2-141:** Refer to the Master Response to Comments Regarding CEQA Significance Determinations (No Impact Versus Less Than Significant Impact).
- O2-142:** Refer to the Master Response to Comments Regarding CEQA Significance Determinations (No Impact Versus Less Than Significant Impact).
- O2-143:** Refer to revisions made to EIR Section 4.9, “Hydrology and Water Quality,” as presented in Appendix A of this Final EIR. Revisions were made to this section to remove text that

discusses earthquake-induced landslide hazards, and confirm that implementation of the applicant's SWPPP will reduce any potential hazards.

- O2-144:** Refer to revisions made to EIR Section 4.9, "Hydrology and Water Quality," as presented in Appendix A of this Final EIR.
- O2-145:** Refer to revisions made to EIR Section 4.9, "Hydrology and Water Quality," as presented in Appendix A of this Final EIR.
- O2-146:** Refer to revisions made to EIR Section 4.9, "Hydrology and Water Quality," as presented in Appendix A of this Final EIR.
- O2-147:** Refer to revisions to EIR Section 4.10, "Land Use and Planning," as presented in Appendix A of this Final EIR.
- O2-148:** Refer to revisions made to EIR Section 4.10, "Land Use and Planning," as presented in Appendix A of this Final EIR. Revisions were made to this section to edit Figure 4.10-1 as necessary and split the map into three separate figures to provide improved readability.
- O2-149:** Refer to revisions made to EIR Section 4.10, "Land Use and Planning," as presented in Appendix A of this Final EIR.
- O2-150:** Refer to revisions made to EIR Section 4.10, "Land Use and Planning," as presented in Appendix A of this Final EIR. Revisions were made to this section to edit Figure 4.10-2 as necessary and split the map into three separate figures to provide improved readability.
- O2-151:** Refer to revisions made to EIR Section 4.10, "Land Use and Planning," as presented in Appendix A of this Final EIR.
- O2-152:** Refer to revisions made to EIR Section 4.10, "Land Use and Planning," as presented in Appendix A of this Final EIR.
- O2-153:** Refer to revisions made to EIR Section 4.10, "Land Use and Planning," as presented in Appendix A of this Final EIR.
- O2-154:** No revision is required. It is widely accepted that the average human ear can perceive changes as small as 3 dBA (the smallest perceptible change).
- O2-155:** Refer to revisions made to EIR Section 4.11, "Noise," as presented in Appendix A of this Final EIR. Revisions were made to Table 4.11-19 for telecommunication line construction per the comment.
- O2-156:** No revision is required. APM NS-2 addresses noise control during construction, but does not indicate the level at which noise during construction should be reduced to ensure a less-than-significant impact. Mitigation Measure NS-1 includes this level, as well as additional measures that may be taken by the applicant and SCE to reduce noise levels.
- O2-157:** No revision is required (refer to response to comment O2-156).

- O2-158:** Refer to revisions made to EIR Section 4.11, “Noise,” as presented in Appendix A of this Final EIR. As discussed in this section, acoustical studies presented by the applicant indicate that operational noise levels from the Central Compression Station would not exceed the most stringent nighttime noise limits at closest residential receptors; however, the applicant’s analysis assumed gas-driven turbines rather than the proposed electric-driven turbines and was also contingent on the application of proper acoustical mitigation. Revisions were made to Mitigation Measure NS-2 to include the incorporation of noise surveys to ensure a less than significant impact, per the commenter’s suggestion.
- O2-159:** Refer to revisions made to EIR Section 4.11, “Noise,” as presented in Appendix A of this Final EIR.
- O2-160:** No revision is required. As discussed in response to comment O2-158, acoustical studies presented by the applicant indicate that operational noise levels from the Central Compression Station would not exceed the most stringent nighttime noise limits at the closest residential receptors; however, the applicant’s analysis assumed gas-driven turbines rather than the proposed electric-driven turbines, and was also contingent on the application of proper acoustical mitigation. As discussed in the Draft EIR, noise data for electric-driven compressors of this size are limited, and existing data are not adequate to show that noise levels from the Central Compressor Station would be reduced to less than 23 dBA at the closest sensitive receptor. Mitigation Measure NS-2 is therefore required to ensure that the noise level at the nearest sensitive receptor is less than 45 dBA.
- O2-161:** Refer to revisions made to EIR Section 4.14, “Recreation,” as presented in Appendix A of this Final EIR.
- O2-162:** No revision is required. Refer to Master Response to Comments About CEQA Significance Determinations (No Impact Versus Less Than Significant Impact).
- O2-163:** No revision is required. Refer to Master Response to Comments About CEQA Significance Determinations (No Impact Versus Less Than Significant Impact).
- O2-164:** No revision is required. Although on-site emissions associated with the Design Alternative would be greater than the proposed project, the electrical power that would supply the environmentally superior alternative would result in the off-site generation of emissions.
- O2-165:** No revision is required. Refer to response to O2-164.
- O2-166:** No revision is required. Refer to response to comment O2-62.
- O2-167:** Refer to revisions made to EIR Chapter 5, “Comparison of Alternatives,” and Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR. Also refer to Master Response to Comments About the Environmentally Superior Alternative.
- O2-168:** No revision is required (refer to response to comment O2-175).

- O2-169:** Refer to Master Response to Comments About CEQA Significance Determinations (No Impact Versus Less Than Significant Impact).
- O2-170:** Refer to revisions made to EIR Chapter 5, “Comparison of Alternatives.” This change has also been made throughout the document.
- O2-171:** Refer to revisions made to EIR Chapter 5, “Comparison of Alternatives.” Revisions were made to this section to include a statement that, although the Natural Substation could be expanded, availability of electrical capacity by itself does not normally ensure or encourage growth within a particular area.
- O2-172:** No revision is required. Refer to Master Response to Comments About Telecommunications Route #4 and Routing Alternative A. Routing Alternative A was removed from EIR Chapter 5, “Comparison of Alternatives.”
- O2-173:** Refer to response to comment O2-171.
- O2-174:** No revision is required. This comment addresses the selection of the Environmentally Superior Alternative, not growth-inducing impacts. Refer to Master Response to Comments About the Environmentally Superior Alternative and Master Response to Comments About CEQA Significance Determinations (No Impact Versus Less Than Significant Impact).
- O2-175:** No revision is required. Refer to Master Response to Comments About Telecommunications Route #4 and Routing Alternative A. Routing Alternative A was removed from EIR Chapter 5, “Comparison of Alternatives.”
- O2-176:** No revision is required. Refer to Master Response to Comments About Telecommunications Route #4 and Routing Alternative A. Routing Alternative A was removed from EIR Chapter 5, “Comparison of Alternatives.”
- O2-177:** Refer to revisions made to EIR Chapter 6, “Cumulative Impacts and Other CEQA Considerations,” as presented in Appendix A of this Final EIR. This change has also been made throughout the document.
- O2-178:** Refer to response to comment O2-96.
- O2-179:** Refer to Master Response to Comments About CEQA Significance Determinations (No Impact Versus Less Than Significant Impact).
- O2-180:** Refer to revisions made to EIR Chapter 6, “Cumulative Impacts and Other CEQA Considerations,” as presented in Appendix A of this Final EIR. This change has also been made throughout the document.
- O2-181:** Refer to response to comment O2-171. Refer also to revisions made to EIR Chapter 6, “Cumulative Impacts and Other CEQA Considerations,” as presented in Appendix A of this Final EIR.

- O2-182:** Refer to revisions made to EIR Chapter 6, “Cumulative Impacts and Other CEQA Considerations,” as presented in Appendix A of this Final EIR. Revisions have been made to the discussion of the injection rate per the comment; other suggested revisions to this paragraph were not accurate, and therefore were not made.
- O2-183:** Refer to revisions made to EIR Chapter 7, “Mitigation Monitoring Plan,” as presented in Appendix A of this Final EIR.
- O2-184:** Refer to revisions made to EIR Chapter 2, “Project Description,” and Section 4.8, “Hazards and Hazardous Materials.” APM HZ-8 has been removed from Table 2-9 and has been converted into Mitigation Measure HZ-2 in EIR Section 4.8. Refer also to response to comment O2-31.
- O2-185:** Refer to revisions made to EIR Chapter 2, “Project Description,” Section 4.8, “Hazards and Hazardous Materials,” and the MMCRP table. APM HZ-8 has been removed from Table 2-9 and the MMCRP table, and has been added as Mitigation Measure HZ-2 in Section 4.8 and the MMCRP table.
- O2-186:** Refer to response to comment O2-184, and to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR. Revisions per the comment were made to Mitigation Measure HZ-8.
- O2-187:** Refer to response to comment O2-184.
- O2-188:** APM HZ-2 has been revised to include this information. Refer to Master Response to Comments About Fire Safety.
- O2-189:** No revision is required. Figure 2 in Appendix E-2 was present in the report at the time it was submitted to the CPUC, and correction of the figure would not materially change the conclusions of the report or the EIR analysis.
- O2-190:** No revision is required. The typo in Appendix E-4 was present in the report at the time it was submitted to the CPUC, and correction of the typo would not materially change the conclusions of the report or the EIR analysis.
- O2-191:** No revision is required. The language of APM BR-08 as included in Appendix E-7 was taken from the PEA. APM BR-08 has since been revised. Refer to revisions made to EIR Chapter 2, “Project Description,” and Section 4.4, “Biological Resources,” as presented in Appendix A of this Final EIR.
- O2-192:** Revisions to APMs and mitigation measures in the MMCRP have been made, as noted in earlier comments.
- O2-193:** Refer to revisions made to EIR Chapter 2, “Project Description,” as presented in Appendix A of this Final EIR. This revision was not included in the table of comments in Appendix A of the commenter’s letter.



- O2-194:** Exhibit A-2 is included in this Final EIR as Appendix C-1. Refer also to revisions made to EIR Section 4.4, “Biological Resources,” as presented in Appendix A of this Final EIR.
- O2-195:** The revisions of Figures 2-3 and 2-4 as presented in Exhibit A-3 have been incorporated into this Final EIR. Refer to revisions made to EIR Chapter 2.0, “Project Description,” as presented in Appendix A of this Final EIR.
- O2-196:** No revision is required. Refer to response to comment O2-62.
- O2-197:** Exhibit A-5 has been incorporated into this Final EIR as Appendix C-3. Refer also to revisions made to EIR Section 4.11, “Noise,” as presented in Appendix A of this Final EIR.
- O2-198:** Refer to Master Response to Comments About CEQA Significance Determinations (No Impact Versus Less Than Significant Impact).

**O3 Chatsworth Neighborhood Council, Land Use Committee, 5/21/2012**

Letter O3



**CHATSWORTH NEIGHBORHOOD COUNCIL**  
P.O. Box 3395, Chatsworth, CA 91313-3395  
Voice: (818) 464-3511 Fax: (818) 464-3585  
www.chatsworthcouncil.org



**LAND USE COMMITTEE**

May 21, 2012

Aliso Canyon Turbine Replacement Project  
505 Sansome Street, Suite 300  
San Francisco, CA 94111

RECEIVED MAY 23 2012

Comments on Draft Environmental Impact Report  
California SCH #2010101075  
Application No. A.09-09-020

Gentlemen and Ladies,

The Land Use Committee of the Chatsworth Neighborhood Council hereby submits its comments on the above-referenced application. The timing of the entire Council's meetings will not permit this letter to be reviewed by the full Council prior to the comment letter deadline. However, based on past recommendations made by the Land Use Committee, it is likely this letter will be adopted by the full Neighborhood Council at its next Board meeting in the first week of June, 2012.

O3-1

Our primary concerns relate to fire and to cultural resources. With respect to fire hazards, it is believed that the purpose of an EIR is significantly circumvented, and the result may be so impaired in result that it may become invalid, where a significant concern by the community about fire hazards is simply not addressed.

O3-2

A disclosure as to the distance that would be seriously damaged in the event of a catastrophic fire event that ignites the storage area should be disclosed. Damage distances projected should include disclosure for catastrophic effect (requiring rebuilding of structures), significant damage (requiring repairs, but not expected to cause a home or other structure to become "red-tagged"), minor damage, and no damage. These statistics should be presented for the existing storage capacity, and also for the proposed increased storage capacity (an approximately 50% increase in phase 1). If additional storage capacity is projected in any other phase, similar data should be presented for those increases, so the cumulative effect of the project can be considered in the Draft Environmental Impact Report.

O3-3

Depending on the results of the above disclosure, additional alternatives for a storage facility to be established in a low population area many be indicated, and if applicable, should be considered.

With respect to mitigation for fire hazards, we believe the City of Los Angeles Fire Department should inspect for hazardous conditions, along power lines and at the storage area, in addition to the internal sources and reliance on rules outlined in the draft EIR. If a jurisdictional issue causes this proposal to be infeasible, then the County of Los Angeles Fire Department should provide a similar inspection service.

O3-4

Additionally, an internal position should be established for a fire safety officer, who is responsible for patrolling power lines and ensuring appropriate brush clearance and other appropriate fire prevention policies are implemented and followed.

O3-5

Aliso Canyon Turbine Replacement Project  
DEIR Comments, Page 2

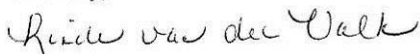
Concerns about fire are valid based on the history of the area which is prone to earthquakes and also wildfires. This history was disclosed in the draft Environmental Impact report. The community has seen how a natural disaster such as the "Northridge" earthquake in 1994 caused a major roadway, Balboa Blvd., to erupt into a giant inferno; the Sesnon fire has been blamed on downed lines associated with delivery of power to this facility. Because the site is near to a major population area, and has known fire risks, extra monitoring by an outside agency, on an ongoing basis is appropriate. | 03-6

Biological and cultural resources. Various members of the community have participated in review of a nearby residential project with similar topography, a Los Angeles county project called Deerlake Highlands. Based on the number of plants at this nearby site (north of the 118 freeway, between Topanga Canyon and Canoga), it seems likely the actual number of plummer mariposa lily plants is far in excess of the two plants noted. Additionally, these plants do not bloom each year. Mitigation for these plants at the other site involved moving affected plants offsite. Additional review for both of the lilies listed in the Draft Environmental Impact Report likely is warranted. If the plants are in an area that is significantly affected by the project, additional measures to safeguard the plants may be warranted and should be investigated. | 03-7

Cultural resources are important to preserve; the list of archaeological items noted is extensive and this area was known to be an area used extensively by the Native Americans. We have attached a memo by professional archaeologist Albert Knight who is quite familiar with this area, and incorporate his comments on this project as our own, as he is much more aware of issues in this area than we are. We recommend that a professional archaeologist, and/or native American monitor, be on site prior to the beginning of the project to review the cultural resources, and be present at all times to monitor activity that involves grading and soil disturbance, as the project is underway. This will provide better opportunity to protect any sites and/or resources that may be found; surface level reviews are not able to disclose what is underground and once destroyed, these items are forever lost, so monitoring activities involving soil disturbance is very important. | 03-8  
| 03-9

Thank you for this opportunity to comment on this project.

Sincerely,



Linda van der Valk  
Chair, Land Use Committee  
Chatsworth Neighborhood Council

To: California Public Utilities Commission and  
Whom it May Concern  
From: Albert Knight  
Board of Directors Santa Susana Mountains Park Association  
Concerning: Southern California Gas Company  
Aliso Canyon Turbine Replacement Project  
Date: May 5, 2012

Friends,

I would like to thank the California PUC for the opportunity to comment on the proposed Southern California Gas Company Aliso Canyon Turbine Replacement Project. I would first like to note that I am a professional archaeologist with approximately 30 years experience in Southern California, I am an Anthropology Department at the Santa Barbara Museum of Natural History, and I am currently employed by a private Cultural Resources Management company, which has its main office in Orange County, California.

O3-10

The area where the proposed project is to take place is quite familiar to me and, as shown by the background research that has been performed for the project, the entire ROW of the project hosts numerous archaeological sites, both prehistoric and historic. There are so many known archaeological sites that I can make my comments quite brief, and simply state that the entire ROW should be considered highly sensitive. All work that requires soil to be moved, including any and all road grading, needs to be carefully monitored by qualified archaeologists, with local experience, as well as by qualified Native Americans, again with local experience.

O3-11

O3-12

I am especially concerned about the main facility on the north side of the San Fernando Valley, about the entire Chatsworth area (in the NW SFV), and about the Simi Hills area. In Los Angeles County, the area of the Chatsworth Academy, and Santa Susana Pass State Historic Park are especially sensitive, as are Sage Ranch and the former Santa Susana Field Lab, in Ventura County.

O3-13

Known archaeological sites should be visited by the monitors PREVIOUS to work taking place in the areas where the sites are located, so that the monitors are familiar with the resource(s), and any and all sites in or adjacent to work areas should be clearly flagged for avoidance. Also, everyone that will be working on the project should receive sensitivity training, so they know what to expect in the field. Project personnel need to understand that if previously known, or previously unknown archaeological resources are encountered during the project, work in that (those) areas need to be temporarily halted, so the resources can be examined and evaluated, before work resumes.

O3-14

O3-15

O3-16

O3-17

Although the project has the potential to disturb numerous archaeological sites, it also has the potential to add to the body of knowledge concerning the area where the project will take place. If all project personnel receive proper training and follow the instructions that they are given, the project should be able to proceed without causing any negative impacts to the resources that exist in the project area.

O3-18

Again, thank you for the opportunity to comment on the proposed project.

Albert Knight

**O3 Chatsworth Neighborhood Council, Land Use Committee, 5/21/2012**

- O3-1:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project.
- O3-2:** Refer to Master Response to Comments About Fire Safety.
- O3-3:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR. Refer also to Master Response to Comments About Fire Safety. The applicant does not anticipate expansion of the Aliso Canyon Natural Gas Storage Field facility after construction of the proposed project.
- O3-4:** Refer to EIR Section 4.8, “Hazards and Hazardous Materials,” which discusses the various jurisdictional responsibilities of the City of Los Angeles, County of Los Angeles, and County of Ventura fire departments, as well as state and local regulations addressing and requiring inspections and brush clearance. Refer also to Master Response to Comments About Fire Safety.
- O3-5:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of the Final EIR. Refer also to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Field Facility”).
- O3-6:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of the Final EIR. Refer also to Master Response to Comments About Fire Safety (“Proximity of Residential Development to Aliso Canyon Natural Gas Storage Field Facility”).
- O3-7:** Refer to revisions made to EIR Section 4.4, “Biological Resources,” as presented in Appendix A of the Final EIR. Mitigation Measure BR-12 addresses this comment, requiring protocol-level pre-construction surveys for Plummer’s mariposa lily, as well as the development of a restoration plan to compensate for losses of these plants.
- O3-8:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project.
- O3-9:** Refer to revisions made to EIR Section 4.5, “Cultural Resources,” as presented in Appendix A of the Final EIR. Mitigation Measure CR-1 requires the preparation of a Cultural Resources Plan, which will identify areas where monitoring of earth-disturbing activities is required, including participation of Native American monitors, as needed. Mitigation Measure CR-3, Construction Monitoring, requires monitoring of cultural resources mitigation and ground-disturbing activities in culturally sensitive areas that have not previously been disturbed.
- O3-10:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project.

- O3-11:** No revision is required. The project construction sites are located in areas containing documented historical, archaeological, and paleontological resources; however, the project would largely result in the replacement of existing infrastructure predominantly within areas previously disturbed by the original construction of the Aliso Canyon Natural Gas Storage Field facility and 66-kV subtransmission line, among other development (such as residential uses). Per Mitigation Measure CR-3, areas considered to be culturally sensitive for the purpose of the proposed project (i.e., areas that have not been previously disturbed) would be monitored by archeologists during ground-disturbing activities.
- O3-12:** See responses to comments O3-9 and O3-11.
- O3-13:** See responses to comments O3-9 and O3-11.
- O3-14:** No response is required. Mitigation Measure CR-1, Cultural Resources Plan, states that the applicant and SCE will retain the services of qualified cultural resources consultants who meet or exceed the U.S. Secretary of the Interior's qualification standards for archaeologists (published in 36 Code of Federal Regulations 61) and who have experience working in the jurisdictions traversed by the project sufficient that they can identify the full range of cultural resources that may be found in the region. The consultants will also have knowledge of the cultural history of the project area and will be approved by the CPUC. In addition, Mitigation Measure CR-2 requires additional cultural surveys prior to issuance of construction permits.
- O3-15:** Refer to revisions made to EIR Section 4.5, "Cultural Resources," as presented in Appendix A of the Final EIR. The fifth bullet of Mitigation Measure CR-1 has been modified to require: "Identification and description of resource mitigation that would be undertaken if required, such as flagging resources adjacent to work areas for avoidance."
- O3-16:** See APM HZ-6, Worker Environmental Awareness, as well as Mitigation Measures CR-1 and CR-7.
- O3-17:** See Mitigation Measures CR-3 and CR-4.
- O3-18:** See APM HZ-6, Worker Environmental Awareness, as well as Mitigation Measures CR-1 and CR-7.

**O4 Santa Susana Mountain Park Association, 5/22/2012**



**SANTA SUSANA MOUNTAIN PARK ASSOCIATION**

*Dedicated to the Preservation of the Santa Susana Mountains and Simi Hills*

A Non-Profit 501(c)(4) Organization  
Incorporated August 31, 1971

Website: [www.ssmpla.com](http://www.ssmpla.com)  
E-mail: [mail@ssmpa.com](mailto:mail@ssmpa.com)

Letter O4

May 22, 2012

RECEIVED MAY 23 2012

Aliso Canyon Turbine Replacement Project  
505 Sansome Street, Suite 300  
San Francisco, CA 94111

Comments on Draft Environmental Impact Report  
California SCH #2010101075  
Application No. A.09-09-020

Gentlemen and Ladies,

The Santa Susana Mountain Park Association, a Chatsworth-area non-profit established in the early 1970's, hereby submits its comments on the above-referenced application.

Our primary concerns relate to fire, biological resources, and cultural resources.

**Fire Concerns:**

The Chatsworth-Porter Ranch area long has been subject to frequent, often intense, fires as the DEIR shows. These fires often start in, or travel through the open spaces areas that we treasure surrounding our community. This susceptibility of the Aliso Canyon site to significant fire danger leads us to urge adoption of three provisions. O4-1

1. Provide adequate disclosure as part of the DEIR about the effect on the surrounding community of a catastrophic fire. Provide information on the distance and severity of damage based on the current gas storage capacity. Provide similar information on the distance and severity of damage based on the expanded storage capacity. The DEIR notes the storage capacity increase is part of Phase 1 – if additional expansion of the storage area is planned beyond Phase 1, provide additional damage projections on any further capacity expansion that may be contemplated. O4-2

2. Have the County of Los Angeles or City of Los Angeles Fire Department provide brush clearance inspections monthly during all months where they perceive there to be a significant fire danger. O4-3

3. Create the position of fire safety officer, who patrols power lines and facilities, and who ensures appropriate brush clearance and other appropriate fire prevention policies are implemented and followed. O4-4

Concerns about fire are valid based on the history of the area, which is prone to earthquakes and also wildfires. This history was disclosed in the draft Environmental Impact report. The community has seen how a natural disaster such as the "Northridge" earthquake in 1994 caused a major roadway, Balboa Blvd., to become a huge fire. The Sesnon fire of 2008 has been blamed on downed lines that in turn ignited a fire that therefore was associated with this facility. O4-5



Aliso Canyon Project  
Page 2

Depending on the results of the above disclosure, establishment of an alternative storage facility in a low population area many be indicated, and if applicable, should be considered. | O4-6

Because the site is near a major population area, and has known significant fire risks, extra monitoring by an outside agency on an ongoing basis is appropriate. | O4-7

With respect to damage that could occur due to a catastrophic fire, disclosure of the effect of the expansion seems to be a fundamentally required disclosure. Failure to disclose what happens seems to be a significant failure in explaining the consequences of the storage expansion. The history of the area shows fire is a significant and ongoing problem. We do not understand why this basic information is not included in the DEIR as presented. | O4-8

**Biological Resources:**

It seems likely the actual number of Plummer's mariposa lily plants is far in excess of the two plants noted. These plants do not bloom each year. Mitigation for these plants at a nearby development, Deerlake Highlands (LA County, west of this site) involved moving affected plants offsite, and maintenance at a nursery during the project, with eventual replanting at a similar site. In that project, the number of Plummer's mariposa lilies was very significant. In this project, the plants could be re-established on site after the construction is completed. Additional review for both of the lilies listed in the Draft Environmental Impact Report likely is warranted, based on the infrequent growth cycle that is greatly affected by low rainfall. If the plants are in an area that is significantly affected by the project, additional measures to safeguard the plants may be warranted and should be investigated. | O4-9

**Cultural Resources:**

The list of noted archaeological items is extensive and this area was known to be an area used extensively by the Native Americans. We attach a memo by professional archaeologist Albert Knight who is quite familiar with this area, and incorporate his comments on this project as our own. We recommend that a professional archaeologist, and/or native American monitor, be on site prior to the beginning of the project to review the cultural resources, and be present at all times to monitor activity that involves grading and soil disturbance, as the project is underway. This will provide better opportunity to protect any sites and/or resources that may be found; surface level reviews are not able to disclose what is underground, and once destroyed, these items are forever lost. Monitoring activities involving soil disturbance is very important. | O4-10

Thank you for this opportunity to comment on this project.

Sincerely,



Teena A. Takata  
President, Santa Susana Mountain Park Association  
P. O. Box 4831  
Chatsworth, CA 91313-4831

**Attachment:**

Letter of Albert Knight concerning Southern California Gas Company Aliso Canyon Turbine Replacement Project, dated May 5, 2012



To: California Public Utilities Commission and  
Whom it May Concern  
From: Albert Knight  
Board of Directors Santa Susana Mountains Park Association  
Concerning: Southern California Gas Company  
Aliso Canyon Turbine Replacement Project  
Date: May 5, 2012

Friends,

I would like to thank the California PUC for the opportunity to comment on the proposed Southern California Gas Company Aliso Canyon Turbine Replacement Project. I would first like to note that I am a professional archaeologist with approximately 30 years experience in Southern California, I am an Anthropology Department at the Santa Barbara Museum of Natural History, and I am currently employed by a private Cultural Resources Management company, which has its main office in Orange County, California.

O4-11

The area where the proposed project is to take place is quite familiar to me and, as shown by the background research that has been performed for the project, the entire ROW of the project hosts numerous archaeological sites, both prehistoric and historic. There are so many known archaeological sites that I can make my comments quite brief, and simply state that the entire ROW should be considered highly sensitive. All work that requires soil to be moved, including any and all road grading, needs to be carefully monitored by qualified archaeologists, with local experience, as well as by qualified Native Americans, again with local experience.

O4-12

O4-13

I am especially concerned about the main facility on the north side of the San Fernando Valley, about the entire Chatsworth area (in the NW SFV), and about the Simi Hills area. In Los Angeles County, the area of the Chatsworth Academy, and Santa Susana Pass State Historic Park are especially sensitive, as are Sage Ranch and the former Santa Susana Field Lab, in Ventura County.

O4-14

Known archaeological sites should be visited by the monitors PREVIOUS to work taking place in the areas where the sites are located, so that the monitors are familiar with the resource(s), and any and all sites in or adjacent to work areas should be clearly flagged for avoidance. Also, everyone that will be working on the project should receive sensitivity training, so they know what to expect in the field. Project personnel need to understand that if previously known, or previously unknown archaeological resources are encountered during the project, work in that (those) areas need to be temporarily halted, so the resources can be examined and evaluated, before work resumes.

O4-15

O4-16

O4-17

O4-18

Although the project has the potential to disturb numerous archaeological sites, it also has the potential to add to the body of knowledge concerning the area where the project will take place. If all project personnel receive proper training and follow the instructions that they are given, the project should be able to proceed without causing any negative impacts to the resources that exist in the project area.

O4-19

Again, thank you for the opportunity to comment on the proposed project.

Albert Knight

#### **O4 Santa Susana Mountain Park Association, 5/22/2012**

- O4-1:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR. Refer also to Master Response to Comments About Fire Safety.
- O4-2:** Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR. Refer also to Master Response to Comments About Fire Safety (“Additional Fire Risk Analysis for the Proposed Project”). The applicant does not anticipate expansion of the Aliso Canyon Natural Gas Storage Field facility after construction of the proposed project.
- O4-3:** Refer to EIR Section 4.8, “Hazards and Hazardous Materials,” which discusses the various jurisdictional responsibilities of the City of Los Angeles, County of Los Angeles, and County of Ventura fire departments, as well as state and local regulations addressing and requiring inspections and brush clearance. Refer also to Master Response to Comments About Fire Safety.
- O4-4:** Refer to Master Response to Comments About Fire Safety.
- O4-5:** Refer to response to comment B4-2.
- O4-6:** Refer to Master Response to Comments About Fire Safety (“Proximity of Residential Development to Aliso Canyon Natural Gas Storage Field Facility”).
- O4-7:** Refer to response to comment O3-6.
- O4-8:** Refer to response to comment O3-3 and Master Response to Comments About Fire Safety (“Additional Fire Risk Analysis for the Proposed Project”).
- O4-9:** Refer to response to comment O3-7.
- O4-10:** Refer to response to comment O3-9.
- O4-11:** Refer to response to comment O3-10.
- O4-12:** Refer to response to comment O3-11.
- O4-13:** Refer to response to comment O3-12.
- O4-14:** Refer to response to comment O3-13.
- O4-15:** Refer to response to comment O3-14.
- O4-16:** Refer to response to comment O3-15.
- O4-17:** Refer to response to comment O3-16.

- O4-18:** Refer to response to comment O3-17.
- O4-19:** Refer to response to comment O3-18.

O5 Valencia Staff, KB Home, 4/5/2012

Letter O5



April 5, 2012

Aliso Canyon Turbine Replacement  
Project Draft EIR  
C/O Ecology & Environment, Inc.  
505 Sansome St., Suite 300  
San Francisco, CA. 94111

***CHANGE OF ADDRESS FOR KB HOME VALENCIA  
PLEASE UPDATE YOUR RECORDS IMMEDIATELY***

To Whom It May Concern:

The KB Home Valencia office moved in October 2011. Any correspondence previously being sent to KB Home, 25115 Avenue Stanford, Suite 215-B, 91355, should now go to:

***KB Home  
25152 Springfield Court  
Suite 180  
Valencia, CA. 91355***

If you have any questions, please contact Kim Meyer at (661) 219-6854 or Yvette Taylor at (661) 219-6906.

Thank you.

*Valencia Staff*  
KB Home

O5-1

**O5    Valencia Staff, KB Home, 4/5/2012**

- O5-1**      The commenter's address has been revised in the CPUC notification mailing list for the Aliso Canyon Turbine Replacement Project EIR.

### 3.3.4 Oral Comments Made at Public Meetings and on the CPUC Hotline

This section provides responses to oral comments about the Draft EIR received during two public meetings on the Draft EIR, held May 2 and 3, 2012 in the project area, as well as responses to comments made on the CPUC hotline for the project application. The oral comments made at the meetings are each designated a commenter number (corresponding to the name of the commenter, which is not presented in this Final EIR) and a comment number, and they are summarized below in italics (above each response). The comments transcribed from the CPUC hotline are presented verbatim.

#### 3.3.4.1 Responses to Oral Comments Made at the May 2, 2012 Meeting on the Draft EIR, in Newhall, California

**P1-1:** *Has the CPUC really looked at the Sesnon fire in detail?*

See response to comment B4-2.

**P2-1:** *Areas of the project site are identified in the Draft EIR (Section 4.5, Cultural Resources) as being in the ROW - does this mean Right of Way?*

The acronym lists in the Draft and Final EIR define ROW as right-of-way.

**P2-2:** *There are likely to be archaeological resources in Aliso Canyon. How will project impacts on archaeological resources from ground disturbance be addressed?*

Refer to revisions made to EIR Section 4.5, "Cultural Resources," as presented in Appendix A of this Final EIR, especially APMs CR-1, 2, 3, and 4, and HZ-6, and Mitigation Measures CR-1, 2, 3, 4, and 5.

**P2-3:** *Will archeological monitors and/or Native American monitors be present during project construction?*

Refer to revisions made to EIR Section 4.5, "Cultural Resources," as presented in Appendix A of this Final EIR, especially Mitigation Measure CR-1. Mitigation Measure CR-1 requires the preparation of a Cultural Resources Plan, which will identify areas where monitoring of earth-disturbing activities is required, including participation of Native American monitors, as needed. Mitigation Measure CR-3, Construction Monitoring, requires monitoring of cultural resources mitigation and ground-disturbing activities in culturally sensitive areas that have not previously been disturbed.

#### 3.3.4.2 Responses to Oral Comments Made at the May 3, 2012 Meeting on the Draft EIR, in Northridge, California

**P3-1:** *The Draft EIR is insufficient with regard to mitigation measures addressing fire hazards.*

Refer revisions made to EIR Section 4.8, "Hazards and Hazardous Materials," as presented in Appendix A of this Final EIR, and Master Response to Comments About Fire Safety.

**P3-2:** *Page 53 of the Executive Summary includes half of a page on fire protection; however, there are 16 pages of mitigation addressing cultural and biological resources. The Draft EIR is insufficient with regard to mitigation measures addressing fire hazards, because the project*

*is in a high wind area, among other reasons. The CPUC should explore “every possible alternative” for supplying power to the proposed project [with regard to reducing the risk of fire].*

Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR, as well as Master Response to Comments About Fire Safety and Master Response to Comments about Underground Alternatives.

**P3-3:** *Comment in favor of the SoCalGas project elements, though not in favor of how the project would be supplied with power. Mitigation measures addressing fire risk for SCE overhead lines are inadequate.*

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR, and the Master Response to Comments About Fire Safety.

**P3-4:** *Mitigation measures addressing fire risk for SCE overhead lines are inadequate.*

Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR, and the Master Response to Comments About Fire Safety.

**P3-5:** *Projects throughout the state should consider undergrounding power lines. This project could be a good starting point for undergrounding. Interested in seeing a comparison of costs for undergrounding lines versus not undergrounding lines.*

Refer to Master Response to Comments About Underground Alternatives.

**P3-6:** *Existing conditions for fire in the project area already represent a danger; the project would increase the existing fire hazard.*

Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR, and the Master Response to Comments About Fire Safety.

**P3-7:** *The CPUC should consider project alternatives that include undergrounded power lines in areas of rugged terrain, because fires in these areas are “almost impossible” to put out, and such alternatives could reduce the overall fire risk from the project.*

Refer to Master Response to Comments About Underground Alternatives.

**P3-8:** *Commenter previously attended a publicly held meeting for the project, but has not been notified of further meetings. Commenter's address is 20272 Via San Sivigno Porter Ranch, CA.*

The commenter has been added to the CPUC notification mailing list for the Aliso Canyon Turbine Replacement Project EIR. Refer also to response to comment P4-1.

**P3-9:** *Undergrounding part or all of the power lines has been economically feasible for similar (though smaller) projects, such as a project performed by the Porter Ranch Development Company, which relocated approximately one mile of 66-kV line from Highway 118 to the City boundary. Undergrounding part of the line should be economically feasible for the proposed project, and as such should be considered for those areas of rugged terrain.*

Refer to Master Response to Comments About Underground Alternatives.

**P4-1:** *There was a large crowd for a previous publicly held meeting on the project. As a member of the Porter Ranch Neighborhood Council board, the commenter does not feel the meeting was appropriately publicized.*

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. The CPUC satisfied CEQA's public notification requirements (CEQA Guidelines Section 15087, Public Review of Draft EIR) by placing notices announcing the availability of the Draft EIR, as well as the times and locations of the Draft EIR public meetings, in the *Santa Clarita Valley Signal*, *Los Angeles Daily News*, and *Ventura County Star* on April 4, 2012. The Notice of Availability (NOA) for the Draft EIR and an electronic copy of the Draft EIR were mailed to 30 federal, state, regional, and local agencies and planning groups and to over 140 other project stakeholders. This included all attendees of the CPUC's scoping meetings for the environmental document (held on November 4 and 5, 2010, in the project area) who requested on the meeting sign-in sheets to be mailed a copy of the Draft EIR. The CPUC also mailed electronic and paper copies of the Draft EIR to the San Fernando, Newhall, and Simi Valley Public Libraries and established a project hotline and website. The CPUC held two public meetings on the Draft EIR in May 2012.

The CPUC also provided public notification of the Draft EIR beyond the requirements of CEQA by sending copies of the NOA to residents and stakeholders within 300 feet of the project ROW, per the requirements of CPUC General Order 131-D. The NOA was mailed to more than 830 interested and potentially interested parties. In addition, the CPUC extended the public review period for the Draft EIR period by two weeks (to June 5) so that comments submitted to the CPUC after the 45-day period could be considered.

**P4-2:** *The Porter Ranch Neighborhood Council supports the SoCalGas project components, but is concerned about the SCE overhead lines project components and fire risk associated with a lack of brush clearance under the lines. The commenter indicated that a lack of brush clearance under power lines was a cause of the Sesnon fire.*

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Refer to revisions made to EIR Section 4.8, "Hazards and Hazardous Materials," as presented in Appendix A of this Final EIR, Master Response to Comments Addressing Fire Safety, and response to comment B4-2.

**P4-3:** *The commenter would like to see the lines placed underground, even though eight miles of undergrounding is estimated to be costly (approximately \$150 million).*

Refer to Master Response to Comments About Underground Alternatives.

**P5-1:** *Past maintenance of the overhead power lines was not sufficient, due at least in part to human failure. How will the new equipment be maintained sufficiently?*



Refer to Master Response to Comments Addressing Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Facility”).

**P5-2:** *The commenter would like to know why SoCalGas was not “held responsible” for the Sesnon fire and why the proposed project is moving forward before responsibility for the Sesnon fire is addressed satisfactorily.*

Refer to response to comment B4-2 and Master Response to Comments Addressing Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Facility”).

**P5-3:** *The project would result in a greater risk of fire in the area caused by the 66-kV line elements of the project. Can the CPUC include the analysis of a disaster (catastrophic fire) scenario in the Draft EIR?*

See Master Response to Comments About Fire Safety (“Additional Fire Risk Analysis for the Proposed Project”).

**P5-4:** *Has the CPUC [project manager] made a site inspection of the SoCalGas facility in Aliso Canyon?*

The CPUC project manager and the CPUC’s environmental consultant visited the site on November 4, 2010 to familiarize themselves with each project component area for the purpose of conducting the CEQA environmental review.

**P5-5:** *The Aliso Canyon facility, which proposes to increase capacity by 50 percent, is located next to a residential community. Does a catastrophic event, similar to the San Bruno explosion, have to happen before the CPUC realizes the fire danger due to the natural gas storage expansion? The commenter likens the project to “San Bruno in the San Fernando” and “walking into a gas chamber.”*

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Refer to Master Response to Comments About Fire Safety (“Proximity of Residential Development to Aliso Canyon Natural Gas Storage Facility”) and the revisions to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR.

**P5-6:** *Ryan Yamamoto of the CPUC prepared a detailed report acknowledging the risk of human failure related to maintenance of the power lines on the storage field property.*

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Refer to Master Response to Comments About Fire Safety and revisions to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR.

**P5-7:** *The commenter stated that they were notified of the meeting four hours prior to the meeting time.*

See response to comment P4-1.

**P5-8:** *The commenter stated that SoCal Gas was responsible for the Sesnon fire.*

See response to comment B4-2.

**P5-9:** *Is the CPUC aware of the existing and proposed housing near and adjacent to the storage field site?*

Refer to Master Response to Comments About Fire Safety (“Proximity of Residential Development to Aliso Canyon Natural Gas Storage Facility”).

**P5-10:** *The CPUC should consider running public notices in the L.A. Times, which would do so as a public service.*

Refer to response to comment P4-1. The *L.A. Times* is circulated in a much larger geographical area than local newspapers within the project area; if the CPUC had posted an ad for public meetings in the Times, it may not have reached its intended audience effectively. Rather than place one ad in a large newspaper such as the *L.A. Times*, the CPUC targeted the project area by placing three notices announcing the availability of the Draft EIR, and the times and locations of the Draft EIR public meetings, in newspapers local to the project: the *Santa Clarita Valley Signal*, *Los Angeles Daily News*, and *Ventura County Star*.

**P5-11:** *Does the CPUC visually inspect the power lines (“H-frames”) for brush clearance?*

In the project component areas, the applicant and SCE conduct regular visual inspections of power line infrastructure. The City of Los Angeles, County of Los Angeles, and County of Ventura fire departments are charged with the responsibility of protecting the public in the project area from losses caused by fire, and they also conduct inspections of SoCalGas’s and SCE’s electrical infrastructure. Refer to the revisions to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR; these revisions discuss the various jurisdictional responsibilities of the City of Los Angeles, County of Los Angeles, and County of Ventura fire departments, as well as state and local regulations addressing and requiring inspections and brush clearance.

**P5-12:** *Existing fire service in the area is inadequate.*

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Refer to the revisions to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR; these revisions discuss the various jurisdictional responsibilities of the City of Los Angeles, County of Los Angeles, and County of Ventura fire departments, as well as state and local regulations addressing and requiring inspections and brush clearance.

**P5-13:** *Shouldn’t the CPUC require that the storage facility have an “in-house fire department,” including helicopters?*

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Refer to the revisions to EIR Section 4.8, “Hazards and Hazardous Materials” (in particular, the discussion of the existing coordination and joint inspections that take place

between staff at the Aliso Canyon Natural Gas Storage Field facility and Los Angeles County Fire Department staff) as well as Master Response to Comments About Fire Safety.

**P5-14:** *If the existing fire emergency response services are adequate, then why weren't these services adequate during the Sesnon fire?*

Refer to Master Response to Comments About Fire Safety and response to comment B4-2.

**P5-15:** *Does the CPUC require that "protection" (from fire) be "elevated" for projects like the proposed project, per "every billion cubic feet" of expansion?*

The proposed project would result in an increase in the maximum natural gas injection rate at the Aliso Canyon Natural Gas Storage Field facility, but would not result in an expansion of natural gas storage capacity or a significant increase in the size of the facility; most of the project footprint would be located on disturbed ground within the existing plant site, and no increase in operations employees would be required. Refer to Master Response to Comments About Fire Safety.

**P5-16:** *Brush clearance is inadequate.*

Refer to response to comment P5-11 and the revisions to EIR Section 4.8, "Hazards and Hazardous Materials," as presented in Appendix A of this Final EIR; these revisions discuss the various jurisdictional responsibilities of the City of Los Angeles, County of Los Angeles, and County of Ventura fire departments, as well as state and local regulations addressing and requiring inspections and brush clearance.

**P5-17:** *Why isn't maintenance in the budget?*

Refer to responses to comments P5-11 and P5-13, and the revisions to EIR Section 4.8, "Hazards and Hazardous Materials," as presented in Appendix A of this Final EIR; these revisions discuss the various jurisdictional responsibilities of the City of Los Angeles, County of Los Angeles, and County of Ventura fire departments, as well as state and local regulations addressing and requiring inspections and brush clearance.

**P5-18:** *Why didn't anyone look into what happened with the San Diego fire in 2007?*

Review of the 2007 San Diego fire is beyond the scope of the CEQA review for the proposed project. Refer to response to comment B4-2.

**P5-19:** *Why weren't Red Flag warnings in place prior to the Sesnon fire?*

Refer to response to comment B4-2.

**P5-20:** *Is the PUC aware that utility companies write their own handbooks for power line maintenance and brush clearance, but they don't adhere to their own booklet?*

Refer to responses to comments P5-11 and P5-13, and the revisions to EIR Section 4.8, "Hazards and Hazardous Materials," as presented in Appendix A of this Final EIR.

**P5-21:** *Commenter suggests that SoCalGas should consider propane as an alternative means of fueling the storage facility.*

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project.

**P5-22:** *The CPUC should consider the safety of humans to be at least as important as business profits.*

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Public safety is of paramount importance to the CPUC in all of its proceedings for natural gas facilities, as discussed and memorialized in an amendment to Public Resources Code Section 963 approved October 7, 2011, which declares that, with regard to natural gas facilities, “it is the policy of the state to place safety of the public and gas corporation employees as the top priority and require that the distribution rate of a gas corporation include sufficient revenues and employee staffing to provide for prompt revision of service to the public consistent with this policy.” Refer also to the Master Response to Comments About Fire Safety and to the revisions to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR.

**P5-23:** *Would the new power line support structures be cement or steel?*

The foundations for the structures supporting the 66-kV line would be concrete. The structures themselves (TSPs) would be steel. The structures supporting the 12-kV Plant Power Line would be wood.

**P6-1:** *What is the CPUC’s responsibility with regard to regulation and representing “the people?”*

Pursuant to Article XII of the Constitution of the State of California, the CPUC is charged with the regulation of investor-owned public utilities. SoCalGas is applying to the CPUC for an amendment to its Certificate of Public Convenience and Necessity (CPCN) for the Aliso Canyon Natural Gas Storage Field facility. The CPUC conducts two parallel processes when considering any application for approval of a CPCN: an application process similar to a court proceeding, in which the CPUC considers whether the proposed project is needed and is in the public interest, and an environmental review process under CEQA. As the lead agency, the CPUC must determine through the CEQA process whether the proposed project would result in significant impacts to the environment, and whether those impacts could be avoided, eliminated, compensated for, or reduced to less than significant levels. Public meetings and hearings are an important part of both of the parallel CPUC processes, and give the public an opportunity to join the CPCN proceeding and provide input into the scope and adequacy of the Draft EIR. Also refer to response to comment P5-22.

**P6-2:** *The commenter stated that the storage field is the largest in the world and is located next to 4,000 homes. The commenter expressed concern that utility companies are too big to see the big picture regarding public safety, and that Los Angeles County may not be able to adequately protect the public in the event of an explosion in the project area, which the commenter believes is likely to happen.*

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. The Aliso Canyon Natural Gas Storage Field facility is the largest underground natural gas storage field operated by the applicant, and is also one of the largest in the United States. Refer to Master Response to Comments About Fire Safety (“Proximity of Residential Development to Aliso Canyon Natural Gas Storage Facility”), and to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR.

**P6-3:** *Winds in the project area reach 120 miles an hour, and can generate a current that causes an electrical shock when a person touches light sockets or cars.*

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Refer to Master Response to Comments About Fire Safety, and EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR.

**P6-4:** *There have been numerous fires in Southern California.*

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Refer to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR. Also refer to Master Response to Comments About Fire Safety and response to comment B4-2.

**P6-5:** *Who sets and enforces fire safety standards?*

Refer to responses to comments P5-11, P5-13, and P6-1. Also refer to Master Response to Comments About Fire Safety and to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR.

**P6-6:** *Commenter believes that SoCalGas profits financially from a fire because a fire would raise SoCalGas’s insurance deductible, thereby justifying rate increases.*

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project.

**P6-7:** *The commenter feels that the CPUC is not adequately regulating utility companies.*

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project.

**P6-8:** *Can the CPUC require the gas storage field facility to have an on-site fire-fighting “department,” including helicopters?*

Refer to response to comment P5-13.

**P6-9:** *Considering that Los Angeles County and City are closing fire stations and there was no presence of fire response in the Sesnon fire, how can you ensure that there is adequate fire response?*

Refer to response to comment B4-2 and Master Response to Comments About Fire Safety, as well as to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR.

**P6-10:** *If the existing facility is being expanded, how is fire risk being reduced?*

Refer to response to comment B4-2 and Master Response to Comments About Fire Safety.

**P6-11:** *The storage facility should move to an area where there are no people, so that expansion of the facility would not pose a risk of impacts to humans. When did SoCalGas move in to the existing facility?*

According to Kunitomi and Schroder (Natural Gas Storage Operations and the Geology of the Aliso Canyon Field, Los Angeles Co., California, in Geology and Tectonics of the San Fernando Valley and East Ventura Basin, Pacific Section, American Association of Petroleum Geologists, Guidebook GB 77, 2001, pages 75-84), Tide Water Associated and successor companies operated the Aliso Canyon gas field until 1972, when SoCalGas purchased the Sesnon and deeper zones for gas storage purposes. Between 1972 and 1993, SoCalGas operated two underground rock storage zones for gas storage. Several other companies, including Texaco, Chevron, and Termo Oil Company operated and continue to operate additional underground zones (the Pliocene zones) for oil production. In 1993, the Gas Company (Semptra) acquired the majority of the Pliocene zones from Texaco, and is the existing principal operator of the Aliso Canyon field.

Refer also to Master Response to Comments About Fire Safety (“Proximity of Residential Development to Aliso Canyon Natural Gas Storage Facility”).

**P6-12:** *Doesn't the CPUC want to protect the safety of the consumers/customers it represents?*

See response to comment P5-22. In its role as lead agency for the applicant’s permit approval, the CPUC must determine through the CEQA process whether the proposed project would result in significant impacts to the environment, including impacts related to fire safety, and whether those impacts could be avoided or reduced to less than significant levels.

**P6-13:** *If there is an explosion at the facility, the CPUC won't take responsibility; “big agencies” aren't paying attention.*

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Refer to Master Response to Comments About Fire Safety and to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR.

**P6-14:** *What happens if the project doesn't get constructed?*

Refer to EIR Section 3.0, “Description of Alternatives,” as presented in Appendix A of this Final EIR, for a discussion of the No Project Alternative.

**P6-15:** *The meeting was not properly noticed.*

Refer to response to comment P4-1.

**P6-16:** *The L.A. Times would run public notices for meetings as a public service.*

Refer to response to comment P4-1 and P5-10.

**P6-17:** *The homes are encroaching closer to the facility.*

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Refer also to Master Response to Comments About Fire Safety (“Proximity of Residential Development to Aliso Canyon Natural Gas Storage Facility”).

**P6-18:** *Who owned the storage field facility in 1974?*

Refer to response to comment P6-11.

**P6-19:** *How much noise would decommissioning/dismantling of the old compressor station create?*

Typical demolition activities at the Aliso Canyon Natural Gas Storage Field facility site (central compressor and office buildings sites) could be as loud as 85 dBA (A-weighted decibels) at 50 feet (this is a conservative estimate of bulldozer noise); however, the distance between the demolition sites on the storage field and the nearest sensitive receptor would ensure that this noise would be attenuated to a level below standards established by the City of Los Angeles and Los Angeles County (75 dBA). Refer to EIR Section 4.11, “Noise,” as presented in Appendix A of this Final EIR.

**P6-20:** *Is the existing Chatsworth to Natural line underground?*

Telecommunications Route #2 would consist of the installation of a new fiber optic cable on existing poles and newly installed poles and within existing and new underground conduit from Chatsworth Substation to the proposed Natural Substation as described in Section 2.0, “Project Description,” of the EIR. The distribution power line upon which Telecommunications Route #2 would be installed is located largely aboveground, although some of this distribution line is also located underground.

**P6-21:** *Will SCE replace or upgrade the power lines in the area of the Chatsworth to Natural telecommunications project component?*

The project does not include reconductoring between the Chatsworth and proposed Natural substations, although some new conductor would be installed to connect the existing 66-kV line with the new Natural substation on the Aliso Canyon Natural Gas Storage Field facility site. Telecommunications Route #2 would consist of the installation of a new fiber optic cable on existing poles and newly installed poles and within existing and new underground conduit from Chatsworth Substation to the proposed Natural Substation, as described in Section 2.0, “Project Description,” of the EIR.

**P6-22:** *As the storage facility expands, should there be an increasingly protective level of safety procedures/management/regulation?*

Refer to response to comment P5-5. Also refer to Master Response to Comments About Fire Safety, and revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of this Final EIR.

**P6-23:** *Are the effects associated with increasing the injection capacity known?*

Impacts associated with the project’s proposed increase in injection rate are disclosed in EIR Chapter 4, as revised and presented in Appendix A of this Final EIR.

**P6-24:** *What are they [SoCalGas] injecting the gas into? We have well water nearby.*

As described in subsection 2.1.1 of EIR Chapter 2, “Project Description,” natural gas at the Aliso Canyon Natural Gas Storage Field facility is compressed, and injected through wells (“injection wells”) into an underground rock storage reservoir during periods of low demand (generally in the summer season) and withdrawn during periods of peak demand (generally in the winter season). The depth of the storage zone ranges from 7,100 feet to 9,400 feet below surface level. The average depth of the wells is approximately 8,500 feet. Operation of these wells is regulated and permitted by the California Department of Conservation, Division of Oil, Gas and Geothermal (DOGGR). The applicant’s DOGGR permit includes requirements that all injection piping, valves, and facilities meet or exceed design standards for the maximum anticipated injection pressure and are maintained in a safe and leak-free condition. The permit also stipulates that DOGGR may require testing to establish that no damage will occur from excessive injection pressures, and that the applicant notify DOGGR of any anticipated changes in a project resulting in alteration of conditions that were originally allowed.

**P6-25:** *SoCalGas got “a raise” of \$250 million after an [unspecified] fire.*

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project.

**P6-26:** *Comment regarding the possibility of performing brush clearance through grazing (from cows that are already present in the area).*

As described in EIR Section 4.8, “Hazards and Hazardous Materials,” CPUC General Order 95, Rule 35 describes tree trimming and brush clearance requirements. In addition, Rule 31.2 requires that lines be inspected frequently to ensure that they are in good condition. The applicant and SCE may use various means to clear brush per these requirements. Although the applicant and SCE may use grazing animals as one of these means, other methods – such as mechanical trimming of vegetation or herbicide application – tend to be more commonly used. Animal grazing may also not be compatible with electrical or telecommunications infrastructure, or the infrastructure at the Aliso Canyon Natural Gas Storage Field facility site.

**P6-27:** *Commenter would like to see the maintenance protocol that SoCalGas uses for reducing fire risk. Did they put a maintenance protocol in place after the 2007, 2008, or 2003 fires?*



Refer to the revisions to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of the Final EIR. Also refer to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Facility”).

**P6-28:** *How long have SoCalGas’s safety regulations addressing fire been in effect? The fire safety regulations and standards mentioned during the meeting are state-wide, not specific to the Sesnon fire.*

Refer to the revisions to Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of the Final EIR. Also refer to Master Response to Comments About Fire Safety and response to comment B4-2.

**P6-29:** *Who makes sure the regulated entities are adhering to fire safety standards?*

Local fire service providers – the Los Angeles County Fire Department, City of Los Angeles Fire Department, and Ventura County Fire Department – inspect the Aliso Canyon Natural Gas Storage Field facility and SCE’s electrical infrastructure to ensure that the applicant and SCE follow fire safety standards as established by the fire departments and the state. Refer also to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of the Final EIR, response to comment P5-11, and Master Response to Comments About Fire Safety.

**P6-30:** *What are the repercussions to SoCalGas of causing fires like the Sesnon fire?*

Refer to response to comment B4-2.

**P6-31:** *Comment that the project area is seismically active and subject to fires.*

Refer to EIR Section 4.6, “Geology, Soils, and Minerals,” for a discussion of existing conditions in the project area with regard to seismic activity. Refer also to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” as presented in Appendix A of the Final EIR, and to Master Response to Comments About Fire Safety.

### **3.3.4.3 Responses to Oral Comments Made on the CPUC Hotline by Scott Rucker**

**P7-1:** *I would like to receive any communications in regards to this Aliso Canyon Project from the PUC and my name is Scott Rucker [spells out name]. Mailing address is 22817 Ventura Boulevard Woodland Hills, CA 91364.*

The commenter has been added to the CPUC notification mailing list for the Aliso Canyon Turbine Replacement Project EIR.

**P7-2:** *I am absolutely not in favor of this project due to the Sesnon Fire in which SoCalGas has physically caused great harm to our community in which the Sesnon fire burned 19,000 acres due to the electrical failure of the dropped high voltage wires into an oak tree from the SoCal Aliso Canyon facility which did not maintain their transmission lines. Due to non-maintenance we are now living at ground zero in this canyon because of the SoCalGas Company and the Aliso Canyon facility and I personally almost died in this fire and we have been absolutely burned out of our home and ranch. And there’s destruction and devastation*

*where we live at this present time almost four years later which the gas company has not reached out to us whatsoever for any time of repayment and or just common decency due to their negligence.*

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project. Refer also to revisions made to EIR Section 4.8, “Hazards and Hazardous Materials,” in Appendix A of the Final EIR for a description of the Sesnon fire, the safety record for the Aliso Canyon Natural Gas Storage Field facility, and proposed measures to mitigate fire risk. Also refer to response to comment B4-2 and the Master Response to Comments About Fire Safety.

**P7-3:** *What makes the commission believe that they will be able to address two more large kV lines and not have the public at absolute danger and absolutely hold us hostage in regards to their novice and their absolute uncompassionate views on taking care of the public?*

Refer to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Facility”). The proposed project includes the reconductoring (cable replacement) of several 66-kV subtransmission line segments, and does not include the installation of new, high-voltage transmission power lines.

**P7-4:** *I believe they should be, this project should be absolutely put on hold until they make absolute restitution to this community and to the 19,000 acres that they burned. I believe that they should be held accountable for this and litigation is proving that they will be held accountable for this but I don’t believe that any application should go forth until this restitution and their acknowledgement and for them to repay the homeowners of the San Fernando Valley.*

Refer to Master Response to Comments About Fire Safety (“Fire Safety of Current and Past Operations at the Aliso Canyon Natural Gas Storage Facility”), and response to comment B4-2.

**P7-5:** *They stated and I believe that they should be held to that standard that they “Serve the public.” Now let us work for the public. Thank you so much.*

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed project.

## 4. Project Overview and Environmental Impacts

All impacts identified during the course of this environmental analysis are summarized in this section. This summary is intended as an overview, and should be used in conjunction with a thorough reading of the Final EIR. The technical analyses in the Final EIR provide justification for the conclusions made in the summary.

Table 4-1 summarizes the impacts addressed in this Final EIR, the level of significance for each impact, and the changes made for this Final EIR. For the full Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) with amendments, see Chapter 5 of this document. The MMCRP will be adopted by the CPUC concurrent with approval of the Final EIR.

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
<b>Aesthetics</b>		
<b>Impact AE-1:</b> Substantial adverse effect on a scenic vista.	<i>No measures required.</i>	Less Than Significant
<b>Impact AE-2:</b> Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway.	<i>No measures required.</i>	Less Than Significant
<b>Impact AE-3:</b> Substantially degrade the existing visual character or quality of the site and its surroundings.	<i>No measures required.</i>	Less Than Significant
<b>Impact AE-4:</b> Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	<b>APM AE-1: Night Lighting.</b> The applicant and SCE will ensure that construction activities occurring at night will use lighting to protect the safety of the construction workers but orient the lights to minimize their effect on any nearby sensitive receptors. The lighting will be directed downward and shielded to eliminate offsite light spill at times when the lighting might be in use.	Less Than Significant
<b>Agriculture and Forestry Resources</b>		
<b>Impact AG-1:</b> Conflict with existing zoning for agricultural use.	<i>No measures required.</i>	Less Than Significant
<b>Impact AG-2:</b> Conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use.	<i>No measures required.</i>	Less Than Significant
<b>Air Quality</b>		
<b>Impact AQ-1:</b> Conflict with/obstruct implementation of SCAQMD or VCAPCD air quality plan.	<i>No measures required.</i>	Less Than Significant
<b>Impact AQ-2:</b> Violate any air quality standard or contribute substantially to an existing or projected air quality violation.	<i>No measures required.</i>	Less Than Significant

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
<p><b>Impact AQ-3:</b> Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment.</p>	<p><b>APM AQ-1: Maintain Engines in Good Working Condition.</b> The applicant and SCE will ensure that equipment engines will be maintained in good condition and in proper tune as per the manufacturers' specifications.</p> <p><b>APM AQ-2: Minimization of Equipment Use.</b> The applicant and SCE will ensure that staff and daily construction activities will be efficiently scheduled to minimize the use of unnecessary/duplicate equipment when possible.</p> <p><b>APM AQ-3: Minimization of Disturbed Areas.</b> The applicant and SCE will ensure that the amount of area disturbed by clearing, grading, earth moving, or excavation operations is minimized to reduce the amount of fugitive dust that is generated during construction in a manner that meets or exceeds the requirements of the South Coast Air Quality Management District's Rule 403 (Fugitive Dust Regulations).</p> <p><b>APM AQ-4: Watering Prior to Grading and Excavation.</b> The applicant and SCE will ensure that pre-grading/excavation activities will include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water (preferably reclaimed, if available) will penetrate sufficiently to minimize fugitive dust during grading activities.</p> <p><b>APM AQ-5: Vehicle Speed Limits.</b> The applicant will post signs in the storage field along designated travel routes and limiting traffic to 15 miles per hour or less <u>on unpaved roads</u>.</p> <p><b>APM AQ-6: Fugitive Dust from High Winds.</b> During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), the applicant and SCE will ensure that all clearing, grading, earth moving, and excavation operations <u>during project construction</u> will be curtailed to the degree necessary to prevent fugitive dust created by onsite activities and operations from being a nuisance or hazard, either offsite or onsite.</p> <p><b>APM AQ-7: Cleaning of Paved Roads.</b> The applicant <del>and</del> SCE will ensure that paved road surfaces will use vacuum sweeping and/or water flushing to remove buildup of loose material to control dust emissions from travel on paved access roads (including adjacent public streets impacted by construction activities) and paved parking areas.</p> <p><b><u>MM AQ-1: Construction Emission Reduction Measures.</u></b> The applicant and SCE will <u>implement the following emission reduction measures for all construction activities:</u></p> <ol style="list-style-type: none"> <li><u>Ensure that all off-road diesel-powered construction equipment with engines greater than 50 horsepower (hp) are compliant with Tier 3 off-road emissions standards where available. In the event equipment with a Tier 3 engine is not available for any off-road engine larger than</u></li> </ol>	<p>Less Than Significant</p>

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p><u>50 hp, that engine shall be operated with tailpipe retrofit controls that reduce exhaust emissions of NO<sub>x</sub> and PM to no more than Tier 3 emission levels.</u></p> <ol style="list-style-type: none"> <li>2. <u>Equipment with an engine not compliant with the Tier 3 standard will be allowed on a case-by-case basis only when the applicant or SCE has documented that no Tier 3 equipment (or emissions equivalent retrofit equipment) is available for a particular equipment type. Each case shall be documented with signed written correspondence by the appropriate construction contractor, along with documented correspondence from at least two construction equipment rental firms representing a good faith effort to locate engines that meet Tier 3 requirements. Documentation will be submitted to CPUC staff for review before equipment is used on the project.</u></li> <li>3. <u>Make available to CPUC staff and/or construction monitors a copy of each piece of construction equipment's certified tier specification, BACT documentation, and/or CARB or SCAQMD operating permit, as applicable, at the time of mobilization of each applicable unit of equipment.</u></li> </ol> <p><b><u>MM AQ-2: Measures to Reduce NO<sub>x</sub> Emissions.</u></b> Prior to construction, the applicant and SCE will submit proposed additional measures to reduce daily emissions of NO<sub>x</sub> to CPUC staff for review and approval. Measures may include the following:</p> <ol style="list-style-type: none"> <li>1. <u>The use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export) or the use of trucks that meet EPA 2007 model year NO<sub>x</sub> emissions requirements if 2010 model year or newer diesel trucks cannot be obtained.</u></li> <li>2. <u>A requirement that, during project construction, all construction equipment will be outfitted with BACT devices certified by CARB and that achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.</u></li> <li>3. <u>Other measures as determined appropriate by the applicant and SCE in consultation with the SCAQMD.</u></li> </ol> <p><u>As applicable, the applicant and SCE will calculate estimated emissions of NO<sub>x</sub> that would still exceed the SCAQMD daily threshold after implementation of MM AQ-2 and will submit these calculations to CPUC staff for review prior to construction.</u></p> <p><b><u>MM AQ-34: Mitigation Agreement for Purchase of Oxides of Nitrogen (NO<sub>x</sub>) Credits.</u></b> <u>Unless the applicant and SCE can demonstrate through the implementation of on-site emission reduction</u></p>	

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p><u>measures (MMs AQ-1 and AQ-2) that project emissions of NO<sub>x</sub> would not exceed the SCAQMD daily emission threshold. The entire amount of emissions of NO<sub>x</sub> due to construction of the proposed project over this threshold will be mitigated through the offset of every pound of NO<sub>x</sub> emissions in excess of the SCAQMD daily significance threshold of 100 pounds per day. The offset of NO<sub>x</sub> emissions will be accomplished through the purchase of either Regional Clean Air Incentive Market Trading Credits (RTCs), Mobile Source Emission Reduction Credits (MSERCs), or a combination of RTCs and MSERCs.</u></p> <p><u>The total amount of NO<sub>x</sub> RTCs and/or MSERCs to be purchased will be calculated when the construction schedule and operating conditions are finalized. The applicant and SCE will prepare a Mitigation Agreement that outlines the proposed purchase of the required RTCs and/or MSERCs. The Mitigation Agreement will be submitted to the CPUC staff and SCAQMD prior to the start of project construction. The SCAQMD may require that the Mitigation Agreement be presented before and reviewed by the SCAQMD Governing Board. The Mitigation Agreement and associated credits will meet the following criteria:</u></p> <ol style="list-style-type: none"> <li><u>The applicant and/or SCE must demonstrate that the emission credits were derived from emission reduction project(s) through existing SCAQMD protocols.</u></li> <li><u>The credits will be current for the time the project takes place (i.e., the RTCs and/or MSERCs must not expire before or during the time period when the emissions from the project would occur).</u></li> <li><u>The applicant and SCE will retire the entire amount of NO<sub>x</sub> emission credits needed to mitigate the exceedance of the construction significance threshold for NO<sub>x</sub> emissions prior to commencement of project construction.</u></li> </ol> <p><u>All emission credits used to mitigate significant air quality impacts from construction of the proposed project will adhere to the SCAQMD's CEQA policies and procedures document titled <i>Revised CEQA Policy and Procedures in Allowing the Use of Emissions Credits to Mitigate Significant Air Quality Impacts from Construction</i>, including procedures for addressing a situation in which NO<sub>x</sub> emissions exceed the original estimation, recordkeeping and reporting, and other procedures. The applicant will also track actual daily emissions during construction according to a monitoring plan that includes records of equipment and vehicle usage, and submit the results of this tracking to CPUC staff on a monthly basis.</u></p>	

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
<b>Impact AQ-4:</b> Exposure of sensitive receptors to substantial pollutant concentrations.	<i>No measures required.</i>	Less Than Significant
<b>Impact AQ-5:</b> Creation of objectionable odors affecting a substantial number of people.	<i>No measures required.</i>	Less Than Significant
<b>Biological Resources</b>		
<b>Impact BR-1:</b> Substantial adverse direct or indirect effect on special status species.	<p><b>APM BR-1a: Preconstruction Surveys.</b> Prior to construction and activities that may include vegetation clearing, staging and stockpiling, or other activities with the potential to directly or indirectly affect wildlife, the applicant and SCE will ensure that preconstruction surveys are conducted by qualified biologists for sensitive biological resources, including special-status wildlife and special-status plant species, in the project component areas, including access roads and staging areas. <del>In the event that special status wildlife and special status plants are identified within a proposed project component area or vicinity (survey buffer), buffers will be established by temporary flagging or fencing (this distance may be greater depending on the species and construction activity, as determined by the biologist) between the identified resource and construction activities. Flagging and fencing will be performed or supervised by a qualified biologist to ensure that these activities are conducted without harm to sensitive species, or habitat flagging and fencing will be performed or supervised by a qualified biologist to ensure that these activities are conducted without harm to sensitive species or habitat. The information gathered from these surveys will be used to determine project planning and minimize impacts on sensitive resources from project related activities. In addition, the results of these surveys will be used to determine the extent to which environmental specialist construction monitors will be required.</del></p> <p>For nesting birds, a field survey will be conducted by a qualified biologist to determine if active nests of bird species protected by the Migratory Bird Treaty Act and/or the California Fish and Game Code are present in the construction zone or within a minimum of 100 feet (500 feet for raptors) of the construction zone. In the event of the identification of nesting birds within a proposed project component area or vicinity, a minimum 50 foot exclusionary buffer will be established by temporary flagging or fencing (this distance may be greater depending on the bird species and construction activity, as determined by the biologist) between the nest site and construction activities. Clearing and construction within the fenced area will be postponed or halted (except for vehicle traffic on existing roads), at the discretion of the biological monitor, until the nest is vacated and juveniles have fledged. The biologist shall serve as a construction monitor during those periods when construction activities occur near active nest areas to ensure</p>	Less Than Significant



Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p><del>that no inadvertent impacts on these nests will occur.</del></p> <p><del>Biological monitoring will be conducted during construction work in areas in close proximity to native habitat to assure project compliance with all APMs and Mitigation Measures.</del></p> <p><b><u>APM BR-1b: Exclusionary Fencing to Protect Special-Status Wildlife and Plants.</u></b> In the event that special-status wildlife and special-status plants are identified within a proposed project component area or vicinity (survey buffer), buffers will be established by temporary flagging or fencing (this distance may be greater depending on the species and construction activity, as determined by the biologist) between the identified resource and construction activities. Flagging and fencing will be performed or supervised by a qualified biologist to ensure that these activities are conducted without harm to sensitive species, or habitat flagging and fencing will be performed or supervised by a qualified biologist to ensure that these activities are conducted without harm to sensitive species or habitat. The information gathered from these surveys will be used to determine project planning and minimize impacts on sensitive resources from project-related activities. In addition, the results of these surveys will be used to determine the extent to which environmental specialist construction monitors will be required.</p> <p><b><u>APM BR-1c: Nesting Bird Surveys.</u></b> For nesting birds, a field survey will be conducted by a qualified biologist to determine if active nests of bird species protected by the Migratory Bird Treaty Act and/or the California Fish and Game Code are present in the construction zone or within a minimum of 100 feet (500 feet for raptors) of the construction zone. In the event of the identification of nesting birds within a proposed project component area or vicinity, a minimum 50-foot exclusionary buffer will be established by temporary flagging or fencing (this distance may be greater depending on the bird species and construction activity, as determined by the biologist) between the nest site and construction activities. Clearing and construction within the fenced area will be postponed or halted (except for vehicle traffic on existing roads), at the discretion of the biological monitor, until the nest is vacated and juveniles have fledged.</p> <p><b><u>APM BR-1d: Construction Monitoring.</u></b> The biologist shall serve as a construction monitor during those periods when construction activities occur near active nest areas to ensure that no inadvertent impacts on these nests will occur. Biological monitoring will be conducted during construction work in areas in close proximity to native habitat to assure project compliance with all APMs and Mitigation Measures.</p> <p><b><u>APM BR-2: Designated Work Zones and Sensitive Resource Avoidance.</u></b> Prior to ground-disturbing activities, the applicant and SCE will ensure that work zones are clearly staked and flagged. Construction work areas will be identified to ensure that construction activities,</p>	

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Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p>equipment, and associated activities are confined to designated work zones and areas supporting sensitive resources (special-status plants and wildlife, and high-value habitats, such as wetlands) are avoided.</p> <p><b>APM BR-3: Post-Construction Restoration for Reconductoring.</b> SCE will ensure that all areas that are temporarily disturbed during 66-kV subtransmission line reconductoring will be restored as close to preconstruction conditions as possible or to the conditions agreed upon between the landowner and SCE following completion of construction of the proposed project.</p> <p><b>APM BR-4: Preconstruction Gnatcatcher Surveys.</b> The applicant and SCE will ensure that protocol-level pre-construction surveys will be conducted for coastal California gnatcatcher, in project component areas where suitable habitat exists <del>and for all project activities proposed within U.S. Fish and Wildlife Service designated critical habitat</del> in accordance with the U.S. Fish and Wildlife Service Coastal California Gnatcatcher (<i>Poliophtila californica californica</i>) Presence/Absence Survey Guidelines, February 28, 1997. In the event that coastal California gnatcatcher are observed in pre-construction surveys, a buffer of 500 feet from any active nest will be flagged and maintained by a biological monitor. <u>If infeasible to maintain a buffer of 500 feet from an active gnatcatcher nest work within or near these areas will be performed outside of the breeding and nesting season.</u> Areas of 2 or more contiguous acres of suitable coastal California gnatcatcher habitat will be identified at the time of pre-construction surveys, and work within or near these areas will be performed outside of the breeding and nesting season (coastal California gnatcatcher breeding/nesting season is approximately February 15 through August 30).</p> <p><b>APM BR-5: Exclusionary Fencing to Protect Habitat Areas.</b> The applicant and SCE will ensure that exclusionary fencing will be installed around work and laydown/staging areas, where necessary, to prevent inadvertent encroachment into the native habitat adjacent to areas of impact. Brightly colored, protective construction fencing and/or silt fencing will be erected surrounding the work area where it abuts native habitat prior to the start of construction and/or demolition.</p> <p><b>APM BR-6: Biological Monitoring.</b> The applicant and SCE will ensure that biological monitoring will be conducted during construction in all areas within 100 feet of native vegetation that has the potential, or is known, to provide habitat for special status species.</p> <p><b>APM BR-7: Wildlife Relocation and Protection.</b> During construction activities, wildlife resources that are not considered to have special status and are determined to be in harm's way may be relocated by the applicant and SCE and/or their construction contractors to native habitat near the work area but outside the construction impact zone in order to avoid injury or mortality.</p>	

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Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p>APM AQ-3. See above.</p> <p>APM AQ-4. See above.</p> <p><del>APM GE-3</del> <b>APM GE-2: Erosion and Sediment Control.</b> The applicant and SCE will ensure that erosion and sediment control measures will be implemented in each of the project component areas during construction activities to reduce the amount of soil displaced and transported to other areas by storm water, wind, or other natural forces. To minimize site disturbance, the applicant and SCE or their respective construction contractors will:</p> <ul style="list-style-type: none"> <li>• Remove only the vegetation that is absolutely necessary to remove (e.g., trim or mow instead of grub where feasible);</li> <li>• Avoid off-road vehicle use outside work zones; and</li> </ul> <p>Instruct all construction personnel on storm water pollution prevention concepts to ensure they are conscious of how their actions affect the potential for erosion and sedimentation.</p> <p><b>APM HZ-6: Worker Environmental Awareness Training.</b> Prior to construction, the applicant and SCE will develop and implement Worker Environmental Awareness Training Programs based on the final engineering design, the results of preconstruction surveys, and a list of mitigation measures developed by the CPUC to mitigate significant environmental effects of the proposed project. Prior to start of work, presentations will be prepared by the applicant and SCE and shown to all workers who will be present on the proposed project component sites during construction. A record of all trained personnel (including logs of training sessions signed by all workers who attended each session) will be kept with the construction foreman. The CPUC will conduct regular (monthly and random) audits to ensure that workers on the project component sites have received the appropriate training. Audits will include worker tests and/or interviews to confirm adequate instruction in construction procedures and mitigation measures.</p> <p>All construction personnel will receive the following:</p> <ol style="list-style-type: none"> <li>1. Instruction for compliance with project component site-specific biological or cultural resource protective measures and mitigation measures that are developed after preconstruction surveys;</li> <li>2. A list of phone numbers for key personnel associated with the proposed project including the archeological and biological monitors, environmental compliance coordinator, and regional spill response coordinator;</li> </ol>	

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Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<ol style="list-style-type: none"> <li>3. Instruction on the South Coast Air Quality Management District Fugitive Dust and Ozone Precursor Control Measures and Portable Engine Operating Parameters;</li> <li>4. Direction that site vehicles must be properly muffled;</li> <li>5. Instruction on what typical cultural resources look like, and instruction that if cultural resources are discovered during construction, to suspend work in the vicinity of the find and contact the site supervisor and archeologist or environmental compliance coordinator;</li> <li>6. Instruction on how to work near any Environmentally Sensitive Areas delineated by archeologists or biologists;</li> <li>7. Instruction on individual responsibilities under the Clean Water Act, the applicant's and SCE's storm water pollution prevention plans, site-specific best management practices, hazardous materials and waste management requirements, and the location of Material Safety Data Sheets as needed for each proposed project component;</li> <li>8. Instructions to notify the site supervisor and regional spill response coordinator in the event of hazardous materials spills or leaks from equipment or upon the discovery of soil or groundwater contamination;</li> <li>9. A copy of the truck routes to be used for material delivery; and</li> <li>10. 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 components.</li> </ol> <p><b>MM BR-1: Trimming of Vegetation.</b> In order to minimize the removal of vegetation in areas of habitat for the coastal California gnatcatcher, for the 66-kV subtransmission line, Telecommunications Route #2, and proposed Natural Substation project areas, SCE will ensure that trimming of all native vegetation, riparian vegetation, and vegetation that provides potential habitat for coastal California gnatcatcher will be performed by a certified arborist or a person with a minimum of 6 years' regional expertise in trimming trees/shrubs in this area and who has worked under a certified arborist monitored by a qualified biologist. <u>Trimming of native trees and native arborescent shrubs will be monitored by a qualified arborist.</u></p> <p><b>MM BR-2: Minimize Removal of Venturan Coastal Sage Scrub.</b> For the 66-kV subtransmission line, Telecommunications Route #2, and proposed Natural Substation project areas, SCE will minimize the removal of Venturan Coastal Sage Scrub associations, particularly within designated critical habitat for the coastal California gnatcatcher. Prior to construction and</p>	

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Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p>for each of these project areas, SCE will:</p> <ol style="list-style-type: none"> <li>1. Ensure that a survey of vegetation and estimate of the total area of intact Venturan Coastal Sage Scrub is completed by a qualified botanist familiar with this vegetation association.</li> <li>2. Avoid removal of more than 10 percent of intact Venturan Coastal Sage Scrub within a single project area. "Project Areas" are defined as: <ol style="list-style-type: none"> <li>a. Storage field project components (including the proposed Natural Substation): areas of ground disturbance during construction;</li> <li>b. Access and other roads that would be constructed/modified: 300 linear feet, with a 100-foot buffer on either side of the road; and</li> <li>c. 66-kV line and Telecommunications Route #2: for each pole, a 100-foot radius around the base, plus 100 feet along each extent of the linear ROW beyond the 100-foot radius area.</li> </ol> </li> <li>3. Ensure that areas of intact, contiguous Venturan Coastal Sage Scrub shall not be reduced below a 2-acre threshold.</li> </ol> <p>In the event that <del>the applicant</del> <u>SCE</u> wishes to remove more than 10 percent of intact Venturan Coastal Sage Scrub within a single project area, or where intact, contiguous areas of Venturan Coastal Sage Scrub may be reduced below a 2-acre threshold, <del>the applicant</del> <u>SCE</u> will compensate for this loss through the restoration and/or creation of Venturan Coastal Sage Scrub habitat per <del>the applicant's</del> <u>SCE's</u> Habitat Restoration Plan for Venturan Coastal Sage Scrub, at a minimum ratio of 2:1 (for example, 2 acres of Venturan Coastal Sage Scrub created or restored for every 1 acre impacted).</p> <p><b>MM BR-3: Habitat Restoration Plan for Venturan Coastal Sage Scrub.</b> Prior to construction of the proposed project, and with the coordination and review of USFWS and <del>CDFG</del> <u>CDFG</u>, <del>the applicant and</del> <u>SCE</u> will prepare a habitat restoration plan for Venturan Coastal Sage Scrub associations for the 66-kV subtransmission line, Telecommunications Route #2, and proposed Natural Substation project areas. The restoration plan will be prepared by a qualified botanist familiar with this vegetation association. Per the requirements of MM BR-2, Venturan Coastal Sage Scrub habitat occurring in these work areas will be identified and quantified; surveys (including vegetation maps) and quantification of Venturan Coastal Sage Scrub habitat will be included in the restoration plan. Restoration will occur at a minimum ratio of 0.5:1 (0.5 acres of Venturan Coastal Sage Scrub created or restored for every 1 acre impacted during project</p>	

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Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p>construction), and may be completed by:</p> <ol style="list-style-type: none"> <li>1. Establishing Venturan Coastal Sage Scrub habitat within the project areas (onsite);</li> <li>2. Establishing Venturan Coastal Sage Scrub habitat outside the project areas (offsite); or</li> <li>3. Purchase of credits and/or mitigation lands at a ratio above 0.5:1 from an entity reviewed and approved by the USFWS and/or CDFG CDFW.</li> </ol> <p>Details of the restoration plan will be finalized pending consultation between <u>the applicant</u>, SCE, USFWS, and <del>CDFG</del>CDFW. For Options 1 and 2 (establishing Venturan Coastal Sage Scrub onsite or offsite), the plan will include the following elements: planting/seeding palettes; monitoring and contingency program; monitoring schedule, including duration and performance criteria (a minimum of 80 percent successful plant establishment after a minimum of three years); and any specific measures that will be required to ensure success of the restoration effort.</p> <p><b>MM BR-4: Restriction of Vehicular Traffic.</b> The applicant and SCE will ensure that, in all project construction areas, vehicular traffic (including movement of all equipment) is restricted to established access roads indicated by flagging and signage. All access roads that are not otherwise assigned official speed limits will be restricted to a speed limit of a maximum of 20 miles per hour.</p> <p><b>MM BR-5: Impacts on Hydrologic Features.</b> Prior to project construction, for all proposed project components in the vicinity of hydrologic features, the applicant and SCE will:</p> <ol style="list-style-type: none"> <li>4. Complete formal delineations per USACE protocols to confirm and determine the extent of jurisdictional wetlands present in the proposed project areas;</li> <li>5. Consult with the USACE and <del>CDFG</del>CDFW to determine whether CWA Section 404 permits and California Department of Fish and Game Code Section 1600 Streambed Alteration Agreements are necessary for the proposed project, apply for these permits as needed, and determine the area of fill that would require compensation;</li> <li>6. Commit to compensatory mitigation for any wetland fill per any required permits and in consultation with USACE and <del>CDFG</del>CDFW (wetland fill requiring mitigation will be compensated for at a minimum ratio of 0.5:1, or 0.5 acres of wetland creation or restoration for every 1 acre of wetland fill caused by the proposed project); and</li> <li>7. Ensure that biological monitors establish and maintain a minimum exclusionary buffer of 50 feet from the delineated extent of all jurisdictional wetland features during project</li> </ol>	

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p>construction.</p> <p>Construction of any proposed project component that requires altering, removing, or filling the bed or bank of seasonal drainages, or other jurisdictional or potentially jurisdictional water features, and/or cannot maintain the 50-foot exclusionary buffer, will be performed only when water is not present in the feature.</p> <p><b>MM BR-6: Avian Safe Building Standards.</b> The applicant and SCE will design all transmission structures installed as part of the proposed project to be consistent with the <i>Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 2006</i> (APLIC 2006).</p> <p><b>MM BR-7: Avian Protection Plans.</b> <u>At least three months prior to construction</u>, the applicant and SCE will develop and implement avian protection plans according to Avian Protection Plan (APP) Guidelines (APLIC &amp; USFWS 2005). The avian protection plans will include provisions to reduce impacts on avian species during construction and operation of the proposed project, and will provide for the adaptive management of project-related issues. The Avian Protection Plans will be reviewed and approved by the CDFG, CDFW, and USFWS prior to construction.</p> <p><b>MM BR-8: Nesting Bird Management Plans.</b> <u>In order to address potential conflicts between construction activities and the activities of nesting birds in the project component areas, the applicant and SCE will create Nesting Bird Management Plans in consultation with USFWS, CDFW, and CPUC staff and will submit to CPUC at least three months prior to construction. The Nesting Bird Management Plans will include measures and an adaptive management program to avoid and minimize impacts to special-status and MBTA-protected bird species during nesting periods during project construction. The Nesting Bird Management Plans will include:</u></p> <ul style="list-style-type: none"> <li><u>Guidelines for determining appropriate and effective buffer distances that will account for specific project settings, bird species, stage of nesting cycle, and construction work type;</u></li> <li><u>Language specifying that the determination of appropriate and effective buffers between construction activities and identified nests will be site- and species-/guild-specific and data-driven, and not based on generalized assumptions regarding all nesting birds;</u></li> <li><u>Language specifying that determinations regarding appropriate and effective buffers between construction activities and identified nests can be made in the project construction area by the CPUC-approved biological monitor, if that monitor is appropriately qualified per standards that will be included in the Nesting Bird Plans. These standards will include requirements for years experience conducting biological surveys, years experience with specific bird species identified within the project area, and educational degree and</u></li> </ul>	

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Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p><u>experience.</u></p> <p><b>MM BR-89: Pre-Construction Surveys for Least Bell's Vireo and Southwestern Willow Flycatcher.</b> Prior to construction, the applicant and SCE will complete protocol-level surveys for least Bell's vireo and southwestern willow flycatcher in areas of suitable or potentially suitable habitat in the proposed project component areas. Surveys will be completed by a permitted biologist(s) according to the survey protocol for least Bell's vireo (USFWS 2001) and southwestern willow flycatcher (Sogge et al. 2010). Whenever least Bell's vireo or southwestern willow flycatcher territory or nest sites are confirmed, the applicant and/or SCE will notify the USFWS and CDFG/CDFW immediately upon return from the field. In the event that any least Bell's vireos or southwestern willow flycatchers or their nests are observed, biologists will establish and maintain a minimum 500-foot exclusionary buffer by installing temporary flagging or fencing between the nest site and construction activities. Federal endangered species recovery permits are not required for least Bell's vireo surveys, but are required in all USFWS regions where the southwestern willow flycatcher breeds (application forms can be downloaded at <a href="http://www.fws.gov/forms/3-200-55.pdf">http://www.fws.gov/forms/3-200-55.pdf</a>). State survey permits also may be required from the CDFG/CDFW for both species.</p> <p><b>MM BR-910: Nesting Golden Eagle.</b> Nesting surveys for golden eagles will be completed per the most recent USFWS survey guidelines by the applicant and SCE prior to project construction and will include areas within 660 feet of proposed project components located within suitable golden eagle nesting habitat. If surveys identify nesting golden eagles within 660 feet of the proposed project component areas, the applicant and SCE will ensure that all construction activities within 660 feet of the nest occur outside of the nesting season (January through June, subject to adjustment based on field observations). The nest will be monitored from outside the 660-foot buffer by a qualified raptor ecologist with demonstrated experience monitoring eagles and knowledge of normal eagle nesting behavior. In the event that the raptor ecologist observes abnormal behavior or notes any sign of potential disturbance to the nesting birds, the ecologist will ensure that work will be stopped within 1,320 feet of the nest. Work can continue within the buffered area(s) after the raptor ecologist determines that the chicks have fledged and the nest is not active for the season. In the event that golden eagle nests are identified on structures to be removed or modified, the structures will be left in place pending consultation with the USFWS and CDFG/CDFW.</p> <p><b>MM BIO-11: Cover Steep-walled Trenches or Excavations during Construction.</b> To prevent entrapment of wildlife, the applicant and SCE will ensure that all steep-walled trenches, auger holes, or other excavations will be covered at the end of each day or completely fenced off at</p>	



Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p><u>night. For open trenches only, these may instead have earthen wildlife escape ramps within the trench maintained at intervals of no greater than 100 feet. These earthen ramps shall have a maximum slope not to exceed 2:1. The applicant's and SCE's biological monitor/s will inspect all trenches, auger holes, or other excavations a minimum of twice per day during non-summer months and a minimum of three times per day during the summer (hotter) months, and also immediately prior to back-filling. All non-special status wildlife species found will be safely removed and relocated out of harm's way, through the use of suitable tools such as a pool net when applicable. For safety reasons, biological monitors will under no circumstance enter open excavations.</u></p> <p><b>MM BR-4012: Restoration of Plummer's Mariposa Lily and Slender Mariposa Lily.</b> The applicant and SCE will complete pre-construction surveys during the appropriate blooming period to identify Plummer's mariposa lily and slender mariposa lily populations in the proposed project component areas at the storage field and in the area of the 66-kV subtransmission line. Plummer's mariposa lily and slender mariposa lily plants will be identified by a qualified biologist and flagged or surrounded with fencing in such a way that disturbance of the populations will be avoided. In the event that populations or individuals of either species cannot be avoided, <del>restoration will occur.</del> The applicant <u>and SCE</u> will develop and implement <del>a</del> restoration plans for both plants which will be reviewed and approved by <del>CDFG</del> <u>CDFW</u> prior to project construction. Restoration will occur after construction and to an extent such that "no net loss" (i.e., replacement of destroyed plants at a 1:1 ratio) is ensured for all plants of either species in the proposed project component areas. Restoration may be completed by:</p> <ol style="list-style-type: none"> <li>1. Establishing Plummer's mariposa lily and slender mariposa lily plants within the proposed project areas (onsite);</li> <li>2. Establishing Plummer's mariposa lily and slender mariposa lily plants outside the project areas (offsite); or</li> <li>3. Purchase of credits and/or mitigation lands at a ratio above 1:1 from an entity reviewed and approved by <del>the USFWS and/or CDFG</del> <u>CDFW</u>.</li> </ol> <p>Details of the restoration plan will be pending consultation between <u>the applicant and CDFW and/or SCE and CDFW, USFWS, and CDFG</u>. For Options 1. and 2. (establishing Plummer's mariposa lily and slender mariposa lily plants onsite or off-site), the plan will include the following elements: planting/seeding palettes; monitoring and contingency program; monitoring schedule, including duration and performance criteria (a minimum of 80 percent successful plant establishment after a minimum of three years); and any specific measures that will be required to</p>	

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p>ensure success of the restoration effort.</p> <p><b>MM BR-4113: Non-Native and Invasive Plant Species.</b> The applicant and SCE will avoid and reduce the spread of non-native and invasive plant species in the proposed project component areas through the following actions:</p> <ol style="list-style-type: none"> <li>1. All equipment brought in from offsite that could transport soils, seeds, or other plant propagules (i.e., seeds, spores, tubers, or stems that can reproduce the plant) will be washed at a containment area to prevent introduction of unwanted plant material to the proposed project component areas;</li> <li>2. All construction vehicles or equipment operating within the proposed project component areas in areas known to have noxious or invasive weeds will similarly be cleaned of any soils or plant materials before transport or re-deployment elsewhere within the proposed project component areas to prevent transferring weeds;</li> <li>3. All soils, gravel, imported fill, or other construction materials brought from offsite that could inadvertently contain unwanted plant propagules will come from confirmed weed-free sources;</li> <li>4. All seeds to be used in revegetation and reclamation activities will come from onsite, or from certified weed-free sources; and</li> <li>5. All temporary disturbance areas <u>not subject to existing infestations of invasive plants</u>, including access roads, transmission line corridors, and towers <del>will</del><u>would</u> be monitored on a quarterly basis for one year after project construction is completed for invasive species establishment, and weed control measures will be initiated immediately upon evidence of invasive species introduction.</li> </ol>	

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
<p><b>Impact BR-2:</b> Substantial adverse effect on riparian habitat or other sensitive natural community.</p>	<p>APM BR-2, APM BR-3, APM BR-5. See above.</p> <p>MM BR-1, MM BR-4. See above.</p> <p>APM AQ-3. See above.</p> <p>APM GE-2. See above.</p> <p>APM HZ-6. See above.</p> <p><b>MM BR-14: Minimize Impact on Riparian Habitat.</b> The applicant and SCE will complete the following:</p> <ol style="list-style-type: none"> <li>1. A qualified ecologist will survey and determine the spatial extent of riparian zones <u>within the area of project disturbance</u> in the areas of the storage field, the 66-kV subtransmission line, and Telecommunications Route #2;</li> <li>2. Where riparian vegetation would be impacted by project construction activities, the applicant and SCE will consult with <del>CDFG</del>CDFW to determine if a Lake and Streambed Alteration Agreement pursuant to California Fish and Game Code <u>Section</u> 1600 would be necessary; and</li> <li>3. In those areas where riparian vegetation is required to be removed, the applicant and SCE will work with a qualified arborist to determine the minimum amount of vegetation required to be removed in order to accommodate project construction, and the correct trimming procedures to employ.</li> </ol> <p><del>MM BR-14: Oak Trees in the Vicinity of Telecommunications Route #2.</del> Prior to construction, SCE will survey the area of Telecommunications Route #2 for individual oak trees that meet the criteria for protection under the Los Angeles County ordinance. All oak trees whose trunks measure 25 inches or more in circumference (8 inches in diameter) will not be removed, nor will ground compaction occur within a 10-foot radius from the drip line of any oak tree that meets this criterion. Impacts on all oak trees within the area of disturbance for Telecommunications Route #2 beyond minor trimming will be avoided and minimized (i.e., no more than 25 percent of any individual oak tree canopy will be trimmed during one growing season). In the event that impacts on oak trees meeting the above criterion cannot be avoided or minimized, the applicant will provide oak tree seedling replacement at a 2:1 ratio, pending consultation with Los Angeles County.</p> <p><b>MM BR-15: Restoration of Native Oak Trees:</b> Consistent with City of Santa Clarita, Los</p>	<p>Less Than Significant</p>

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p><u>Angeles County, and Ventura County policies and guidance addressing trees of the oak genus, the applicant and SCE will take measures to avoid and minimize impacts to oak trees resulting from project construction activities, and will plant replacement trees in compensation for any trees damaged or removed. The applicant and SCE will prepare oak tree survey and replacement plans prior to construction, and, after the completion of final engineering design of the project elements, the applicant and SCE will complete pre-construction surveys, and submit survey results to CPUC staff, to identify all individual trees of the oak genus indigenous to California located in the proposed project component areas. Oak trees will be identified by a qualified arborist, who will record a brief description of each tree (height, width, approximate age, condition, and species). All construction activities that take place within the driplines of oak trees (i.e., the outermost extent of the canopy) that have the potential to damage or result in the removal of oak trees (e.g., more than 25 percent trimming of any individual oak tree canopy during one growing season, excavation or paving near oak trees, oak tree removal) will be monitored by a qualified arborist. Trimming, damage to, or loss of oak trees within the project construction areas shall not occur until the trees are evaluated by a qualified arborist, who shall identify appropriate measures to minimize any tree loss which may include the placement of fencing around the dripline, padding construction vehicles, or the placement of protective covering (matting) under the existing dripline during construction activities. If construction activities would lead to damage or the removal of any oak tree with a trunk of 8 inches or more in diameter at 4.5 feet ("breast height"), the tree will be replaced at a 5:1 ratio. Replacement tree planting will be monitored by a qualified arborist, who will ensure the implementation of the following:</u></p> <ol style="list-style-type: none"> <li><u>1. Replacement trees will be initially planted in 15 gallon containers, and then permanently planted in areas deemed suitable by the arborist;</u></li> <li><u>2. Replacement trees will be monitored for 5 years after initial planting for survivability (pursuant to a monitoring schedule established by the arborist); after the 5-year period, the arborist will evaluate whether the trees are capable of surviving without further maintenance;</u></li> <li><u>3. Other measures determined necessary by the arborist to ensure the success of all (100 percent) tree replacement plantings.</u></li> </ol> <p><u>Tree removal shall not be permitted until replacement trees have been planted or transplanting sites are approved by CPUC staff.</u></p>	

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
<b>Impact BR-3:</b> Substantial adverse effect on federally protected wetlands.	APM BR-2. See above. MM BR-5. See above. APM AQ-3. See above. APM GE-2. See above. APM HZ-6. See above.	Less Than Significant
<b>Impact BR-4:</b> Substantial interference with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impendance of the use of native wildlife nursery sites.	APM BR-2. See above.	Less Than Significant
<b>Impact BR-5:</b> Conflict with local policy and ordinance protecting oak trees.	MM BR-15. See above. APM AQ-3 and APM AQ-4. See above.	Less Than Significant
<b>Cultural Resources</b>		
<b>Impact CR-1:</b> Substantial adverse change in the significance of an historical resource.	<b>APM CR-1: Conductor Pull and Tension Sites.</b> SCE will ensure that, where feasible, conductor pull and tension sites are located on existing level areas and existing roads to minimize the need for grading and cleanup.  <b>APM CR-2: Unidentified Cultural Resources.</b> The applicant and SCE will ensure that, if previously unidentified cultural resources are unearthed during construction activities, construction will be halted in that area and directed away from the discovery until a qualified archaeologist assesses the significance of the resource. If determined to be required by the archeologist, the archaeologist will evaluate the significance of the discovered resources based on eligibility for the California Register of Historical Resources (CRHR) or local registers. Should any cultural resources be identified during construction activities in all project areas (including but not limited to culturally sensitive areas), the applicant and SCE will ensure that qualified archaeologists will monitor cultural resources mitigation and ground-disturbing activities in the area of the find. The size of the area of the find will be determined by the archeologist. The archaeologist will recommend appropriate measures to record, preserve, or recover the resources. Preliminary recommendations of CRHR eligibility made by the archaeologist will be reviewed by the CPUC.	Less Than Significant

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p><b>APM CR-4: Cultural Surveys After Final Project Siting.</b> Once final siting for SCE project components is completed, SCE or its contractor will complete additional pedestrian surveys for cultural resources, for all areas of proposed disturbance that are not currently located in a built environment within the 66-kV subtransmission line reconductoring route, access roads, and staging areas; and Telecommunications Route #2, access roads, and staging areas. The information gathered from these surveys will be used to determine project planning and design in order to avoid sensitive resources and identify measures that would minimize impacts on sensitive resources from project-related activities. In addition, the results of these surveys will be used to determine the extent to which environmental specialist construction monitors will be required. The survey will result in a report detailing the research design, methods and results of the survey. This report will be submitted to the CPUC.</p> <p><b>MM CR-1: Cultural Resources Plan.</b> The applicant and SCE will retain the services of qualified cultural resources consultants who meet or exceed the U.S. Secretary of the Interior qualification standards for archaeologists published in 36 Code of Federal Regulations 61 and have experience working in the jurisdictions traversed by the project, sufficient that they can identify the full range of cultural resources that may be found in the region. The consultants will also have knowledge of the cultural history of the project area and will be approved by California Public Utilities Commission (CPUC) staff. Prior to issuance of construction permits, the applicant and SCE will submit Archeological Monitoring and Treatment Cultural Resources Plans for the respective project components, prepared by the approved contractor consultant(s) for review and approval by the CPUC staff. The intent of the Cultural Resources Plans will be to address cultural resources eligible for the CRHR that cannot be preserved by avoidance and to identify areas where monitoring of earth-disturbing activities is required. The monitoring plan shall include, at a minimum:</p> <ul style="list-style-type: none"> <li>• A list of personnel to which the plan applies;</li> <li>• Requirements, as necessary, and plans for continued Native American involvement and outreach, including participation of Native American monitors during ground-disturbing activities as determined appropriate;</li> <li>• Brief identification and description of the general range of the resources that may be encountered;</li> <li>• Identification of the elements of a site that would lead to it meeting the definition of a cultural resource requiring protection and mitigation;</li> </ul>	

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<ul style="list-style-type: none"> <li>• Identification and description of resource mitigation that would be undertaken if required, <u>such as flagging resources adjacent to work areas for avoidance</u>;</li> <li>• Description of monitoring procedures that will take place for each project component area as required;</li> <li>• Description of how often monitoring will occur (e.g., full-time, part time, spot checking);</li> <li>• Description of the circumstances that would result in the halting of work;</li> <li>• Description of the procedures for halting work and notification procedures for construction crews;</li> <li>• Testing and evaluation procedures for resources encountered;</li> <li>• Description of procedures for curating any collected materials;</li> <li>• Reporting procedures; and</li> <li>• Contact information for those to be notified or reported to.</li> </ul> <p><b>MM CR-2: Additional Cultural Resources Surveys.</b> Prior to issuance of construction permits, the applicant and SCE will <del>retain</del><u>ensure that</u> qualified archaeological <del>contractor</del><u>consultant(s)</u>, as specified in the <u>Archeological Monitoring and Treatment Cultural Resources Plans</u>, <del>to</del><u>will</u> conduct intensive-level cultural resources surveys (transects no greater than 15 meters) for all areas to be disturbed that have not already been surveyed for cultural resources and, prior to the project, had previously been undisturbed. Reports that specify the research design, methods, and survey results will be submitted to <del>the</del><u>the</u> CPUC <u>staff</u> for review. Cultural resources surveys for areas along Telecommunications Route #3 that are located more than 600 feet east of San Fernando Substation <u>and along Telecommunications Route #4 south of Balboa Boulevard and north of Sharp Avenue</u> <del>will not be required, because these areas are located within developed residential neighborhoods that are and are previously disturbed areas.</del></p> <p><b>MM CR-3: Construction Monitoring.</b> Prior to issuance of grading permit(s), the applicant and SCE will retain qualified archaeologists as specified in the Cultural Resources Plans to monitor cultural resources mitigation and ground-disturbing activities in culturally sensitive areas. Culturally sensitive areas would include those areas along the 66-kV subtransmission line reconductoring routes and Telecommunications Routes <u>#3 and #4</u> and within the storage field that have not previously been disturbed. Cultural resources monitoring for areas along Telecommunications Route #3 that are located more than 600 feet east of San Fernando</p>	

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p>Substation <u>and areas along Telecommunications Route #4 south of Balboa Boulevard and north of Sharp Avenue</u> will not be required because these areas are located within <u>developed residential neighborhoods and that are previously disturbed areas</u>. The qualified archaeologists will attend preconstruction meetings to provide comments and/or suggestions concerning monitoring plans and discuss excavation plans with excavation contractors.</p> <p><b>MM CR-4: Stop Work for Unanticipated Cultural Resources Discoveries.</b> In the event that previously unidentified cultural resources are uncovered during implementation of the project, the applicant and SCE will ensure that ground-disturbing work would be halted or diverted away from the discovery to another location. The CPUC <u>staff-approved archeologist</u> <del>will</del> <u>will inspect and review</u> the discovery and determine whether further investigation is required. If the discovery is significant but can be avoided and no further impacts would occur, the resource would be documented appropriately and no further effort would be required. If the resource is significant but cannot be avoided and may be subject to further impact, the CPUC <u>staff-approved archeologist</u> <del>will</del> <u>will monitor</u> would evaluate the significance of the resource based on eligibility for the California Register of Historical Resources (CRHR) or local registers and implement appropriate measures in accordance with the <u>Archeological Monitoring and Treatment Cultural Resources Plans</u>.</p> <p><b>MM CR-5: Cultural Resources Reporting.</b> Prior to final inspection after construction of project components has been completed, the applicant's and SCE's qualified archaeologists as specified in the <u>Archeological Monitoring and Treatment Cultural Resources Plans</u> will submit reports to the CPUC <u>staff</u> summarizing all monitoring and mitigation activities and confirming that all mitigation measures have been implemented. If a cultural resource that meets the definition of a significant resource is encountered and data recovery is necessary, then a data recovery program will be implemented for the resource that is approved by both the qualified archeologist/s and <del>the</del> CPUC <u>staff</u>.</p>	
Impact CR-2: Substantial adverse change in the significance of an archaeological resource.	<p>APM CR-1, APM CR-2, APM CR-4. See above.</p> <p>APM HZ-6. See above.</p> <p>MM CR-1, MM CR-2, MM CR-3, MM CR-4. See above.</p>	Less Than Significant



Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
<p><b>Impact CR-3:</b> Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.</p>	<p><b>MM CR-6: Paleontological Monitoring and Treatment Plans.</b> Prior to construction-permit issuance, the applicant and SCE will retain CPUC staff-approved paleontologists to prepare Paleontological Monitoring and Treatment Plans, and submit to the CPUC staff for review and approval. The CPUC staff-approved paleontologists will have knowledge of the local paleontology and be familiar with paleontological procedures and techniques.</p> <p>The Paleontological Monitoring and Treatment Plans will follow Society of Vertebrate Paleontology guidelines and meet all regulatory requirements. The Paleontological Monitoring and Treatment Plans will address the 66-kV subtransmission line reconductoring routes, Telecommunications route-Route #2, and Telecommunications Route #3, Telecommunications Route #4, Natural Substation, guardhouse, and entry road widening sites. The Paleontological Monitoring and Treatment Plans will identify construction impact areas of moderate to high sensitivity for encountering potential paleontological resources and the shallowest depths at which those resources may be encountered. The Paleontological Monitoring and Treatment Plans will detail the criteria to be used to determine whether an encountered resource is significant and if it should be avoided or recovered for its data potential. The Paleontological Monitoring and Treatment Plans will also detail methods of recovery, preparation and analysis of specimens, final curation of specimens at a federally accredited repository, data analysis, and reporting.</p> <p>The Paleontological Monitoring and Treatment Plans will outline coordination strategies to ensure that CPUC staff-approved paleontological monitors will conduct full-time monitoring of all grading activities in sediments determined to have a moderate to high sensitivity. For sediments of low or undetermined sensitivity, the Paleontological Monitoring and Treatment Plans will specify what level of monitoring is necessary. Sediments with no sensitivity will not require paleontological monitoring. The Paleontological Monitoring and Treatment Plans will define specific conditions in which monitoring of earthwork activities could be reduced and/or depth criteria established to trigger monitoring. These factors will be defined by the CPUC staff-approved paleontologists.</p> <p><b>MM CR-7: <del>Construction Personnel Training</del> Paleontological Sensitivity Training.</b> Prior to the initiation of construction or ground-disturbing activities in areas with high paleontological sensitivity, the applicant and SCE shall ensure that all construction personnel conducting rough grading shall be trained regarding the recognition of possible subsurface paleontological resources and protection of all paleontological resources during construction grading. The applicant and SCE will complete training for all applicable personnel. Training will inform all applicable personnel of the procedures to be followed upon the discovery of paleontological resources. All personnel will be instructed that unauthorized collection or disturbance of protected</p>	<p>Less Than Significant</p>

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p>fossils on- or off-site by the applicant or SCE or their representatives or employees is illegal and that violators shall be subject to prosecution under appropriate federal and state laws. Unauthorized resource collection or disturbance may constitute grounds for the issuance of a stop work order.</p> <p><b>MM CR-8: Paleontology Construction Monitoring.</b> Based on the Paleontological Monitoring and Treatment Plans, the applicant and SCE will conduct paleontological monitoring using CPUC staff-approved paleontological <del>contractor</del> <u>monitors</u>. This will include monitoring during rough grading and trenching in areas determined to have high paleontological sensitivity and that have the potential to be shallow enough to be adversely affected by such earthwork as determined by the CPUC staff-approved <del>paleontological monitors</del> <u>Monitoring and Treatment Plans</u>.</p> <p><b>MM CR-9: Stop Work for Unanticipated Paleontological Discoveries.</b> In the event that previously unidentified paleontological resources are uncovered during implementation of the project, the applicant and SCE will ensure that ground-disturbing work would be halted or diverted away from the discovery to another location. A CPUC staff-approved paleontological <del>steal monitor</del> would inspect the discovery and determine whether further investigation is required. If the discovery is significant but can be avoided and no further impacts would occur, the resource would be documented in the appropriate paleontological resource records and no further effort would be required. If the resource is significant but cannot be avoided and may be subject to further impact, the CPUC staff-approved paleontological monitor would evaluate the significance of the resource and implement appropriate measures in accordance with the Paleontological Monitoring and Treatment Plans.</p> <p><b>MM CR-10: Paleontological Data Recovery.</b> Prior to final inspection after construction of project components has been completed, if avoidance of significant paleontological resources is not feasible during grading, treatment (including recovery, specimen preparation, data analysis, curation, and reporting) will be carried out by the applicant and SCE in accordance with the approved Paleontological Monitoring and Treatment Plans.</p>	
Impact CR-4: Disturb any human remains, including those interred outside of formal cemeteries.	<p><b>APM CR-3: Human Remains.</b> The applicant and SCE will ensure that, if human remains are encountered during construction or any other phase of development, work will be halted in the area and directed away from the discovery. The County Coroner will be notified within 24 hours of the discovery. No further disturbance will occur until the County Coroner makes the necessary findings of origin and disposition pursuant to Public Resources Code 5097.98–99, Health and Safety Code 7050.5. If the coroner determines that the burial is not historic, but prehistoric, the Native American Heritage Commission (NAHC) will be contacted to determine the most likely descendent (MLD) for this area. The MLD may become involved with the disposition of the burial</p>	Less Than Significant

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p>following scientific analysis. If the remains are determined to be Native American, the Native American Heritage Commission will be notified within 24 hours as required by Public Resources Code 5097. The CPUC will mediate any disputes regarding treatment of remains.</p> <p>APM CR-4. See above.</p> <p>APM HZ-6. See above.</p> <p>MM CR-1, MM CR-2, MM CR-3, MM CR-4, MM CR-5, MM CR-10. See above.</p>	
<b>Geology, Soils, and Mineral Resources</b>		
<b>Impact GE-1:</b> Expose people or structures to risk of loss, injury, or death involving rupture of a known earthquake fault.	<b>APM GE-1: Geotechnical Studies.</b> The applicant will ensure that, for the construction of the Central Compressor Station, construction procedures will be conducted as discussed in the recommendations sections of the Preliminary Geotechnical Investigation Reports prepared by Globus (2006) and Mactec (2011) to avoid impacts related to unstable geologic conditions. In addition, pre-engineering geotechnical studies will be completed by the applicant and SCE for the proposed Natural Substation and select TSP locations prior to construction. The pre-engineering geotechnical studies will evaluate the depth to the water table; document evidence of faulting; and determine liquefaction potential, physical properties of subsurface soil, soil resistivity, slope stability, and the presence of hazardous materials. The applicant and SCE will further ensure that, for the construction of the Natural Substation and select TSP locations, construction procedures will be conducted as discussed in the recommendations section of the geotechnical studies report.	Less Than Significant
<b>Impact GE-2:</b> Expose people or structures to the risk of loss, injury, or death involving strong seismic ground shaking.	APM GE-1. See above.	Less Than Significant
<b>Impact GE-3:</b> Expose people or structures to the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.	APM GE-1. See above.	Less Than Significant
<b>Impact GE-4:</b> Expose people or structures to the risk of loss, injury, or death involving landslides.	APM GE-1. See above.	Less Than Significant
<b>Impact GE-5:</b> Result in substantial soil erosion or the loss of topsoil.	<p>APM GE-2. See above.</p> <p>APM AQ-3. See above.</p> <p>MM BR-5. See above.</p>	Less Than Significant

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
<b>Impact GE-6:</b> Located on a geologic unit or soil that is or would become unstable and result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	APM GE-1. See above.	Less Than Significant
<b>Impact GE-7:</b> Located on expansive soil.	APM GE-1. See above.	Less Than Significant
<b>Greenhouse Gas Emissions</b>		
<b>Impact GHG-1:</b> Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	APM AQ-1: Maintain Engines in Good Working Condition APM AQ-2: Minimization of Equipment Use APM GHG-1: Engine Maintenance APM GHG-2: Scheduling	Less Than Significant
<b>Impact GHG-2:</b> Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	<i>No measures required.</i>	Less Than Significant
<b>Hazards and Hazardous Materials</b>		
<b>Impact HZ-1:</b> Significant hazard from routine transport, use, or disposal of hazardous materials.	<p><b>APM HZ-3: Hazardous Materials Spill and Release Prevention.</b> The applicant and SCE will ensure that construction procedures are implemented to minimize the potential for hazardous material spills and releases in each of the project component areas.</p> <p><b>APM HZ-5: Hazardous Materials Use and Storage and Hazardous Waste.</b> The applicant and SCE will ensure the following during construction of the proposed project components:</p> <ul style="list-style-type: none"> <li>All hazardous materials (including fuels, lubricants, and cleaning solvents) will be stored, handled, and used in accordance with applicable regulations.</li> <li>For all hazardous materials in use at construction sites, Material Safety Data Sheets will be available for routine or emergency use.</li> </ul> <p>In addition, the applicant will ensure the following for the storage field project components during construction:</p> <ul style="list-style-type: none"> <li>All hazardous materials planned for use or storage at the storage field site during construction of the proposed Central Compressor Station will be preapproved by the applicant's designated safety staff. Approval of hazardous materials will be determined only</li> </ul>	Less Than Significant

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p>after full review of the Material Safety Data Sheet for the proposed material.</p> <ul style="list-style-type: none"> <li>Hazardous materials storage locations at the storage field will be determined based on the storm water pollution prevention plan and storage field policy. Existing materials are stored within the storage field's hazardous material and hazardous waste storage area.</li> </ul> <p>The applicant and SCE will also ensure the following during operation of the proposed project components:</p> <ul style="list-style-type: none"> <li>All hazardous and nonhazardous wastes generated during operation of the proposed project (e.g., waste oil and gas condensates from the compressor station) will be classified and managed in accordance with federal and state regulations and site-specific permits.</li> </ul> <p>All hazardous materials (including fuels, lubricants, and cleaning solvents) will be stored, handled, and used in accordance with applicable regulations.</p> <p><b>APM HZ-6: Worker Environmental Awareness Training.</b> Prior to construction, the applicant and SCE will develop and implement Worker Environmental Awareness Training Programs based on the final engineering design, the results of preconstruction surveys, and a list of mitigation measures developed by the CPUC to mitigate significant environmental effects of the proposed project. Prior to start of work, presentations will be prepared by the applicant and SCE and shown to all workers who will be present on the proposed project component sites during construction. A record of all trained personnel (including logs of training sessions signed by all workers who attended each session) will be kept with the construction foreman. The CPUC will conduct regular (monthly and random) audits to ensure that workers on the project component sites have received the appropriate training. Audits will include worker tests and/or interviews to confirm adequate instruction in construction procedures and mitigation measures.</p> <p>All construction personnel will receive the following:</p> <ol style="list-style-type: none"> <li>Instruction for compliance with project component site-specific biological or cultural resource protective measures and mitigation measures that are developed after preconstruction surveys;</li> <li>A list of phone numbers for key personnel associated with the proposed project including the archeological and biological monitors, environmental compliance coordinator, and regional spill response coordinator;</li> <li>Instruction on the South Coast Air Quality Management District Fugitive Dust and Ozone</li> </ol>	

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p>Precursor Control Measures and Portable Engine Operating Parameters;</p> <ol style="list-style-type: none"> <li>Direction that site vehicles must be properly muffled;</li> <li>Instruction on what typical cultural resources look like, and instruction that if cultural resources are discovered during construction, to suspend work in the vicinity of the find and contact the site supervisor and archeologist or environmental compliance coordinator;</li> <li>Instruction on how to work near any Environmentally Sensitive Areas delineated by archeologists or biologists;</li> <li>Instruction on individual responsibilities under the Clean Water Act, the applicant's and SCE's storm water pollution prevention plans, site-specific best management practices, hazardous materials and waste management requirements, and the location of Material Safety Data Sheets as needed for each proposed project component;</li> <li>Instructions to notify the site supervisor and regional spill response coordinator in the event of hazardous materials spills or leaks from equipment or upon the discovery of soil or groundwater contamination;</li> <li>A copy of the truck routes to be used for material delivery; and</li> <li>Instruction that noncompliance with any laws, rules, regulations, or mitigation measures could result in being barred from participating in any remaining construction activities associated with the proposed project components.</li> </ol> <p><b>APM HZ-7: Wood Pole Recycling and Disposal.</b> SCE will ensure that utility pole and other utility wood waste is reused by SCE, returned to the manufacturer, disposed of in a Class I hazardous waste landfill, or disposed of in the lined portion of a municipal landfill certified by the associated Regional Water Quality Control Board.</p>	
<b>Impact HZ-2:</b> Significant hazard from accident conditions involving the release of hazardous materials.	<p><b>APM HZ-3, HZ-5, HZ-6.</b> See above.</p> <p><b>APM HZ-4: Contaminated Soil Disposal.</b> The applicant and SCE will ensure that any soil from excavation and grading activities that is suspected of being contaminated with oil or other hazardous materials is characterized and disposed offsite at an appropriately licensed waste facility.</p> <p><b>MM HZ-1: Soil Sampling and Contaminated Soils Contingency Plan.</b> The applicant will prepare a Soil Sampling and Contaminated Soils Contingency Plan that would outline procedures for testing soils in locations where contaminated soils are suspected to be present including the</p>	Less Than Significant

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	office building and Central Compressor Station site locations. The <del>Soil Sampling and</del> Contaminated Soils Contingency Plan will also outline the steps that would be implemented if contaminated soils are encountered during pre-construction soil sampling and testing or if they are encountered at any point during construction. Provisions outlined in this plan would include phone numbers of city, county, state, and federal agencies and primary, secondary, and final cleanup procedures. In addition, the plan would address health and safety procedures to minimize environmental impacts in the event that hazardous soils or other materials are encountered during construction of the project, including measures such as worker training, containerization and storage, and monitoring. The plan would also establish security measures to prevent unauthorized entry to cleanup sites and to reduce hazards outside the investigation/cleanup area and would identify appropriate, licensed disposal facilities, and haulers.	
<b>Impact HZ-3:</b> Emit hazardous emissions or involve handling hazardous materials, substances or waste within one-quarter mile of an existing or proposed school.	<b>APM HZ-3, HZ-5, HZ-6.</b> See above.	Less Than Significant
<b>Impact HZ-4:</b> Be located on a site that is included on a list of hazardous materials sites.	<b>MM HZ-1.</b> See above.	Less Than Significant
<b>Impact HZ-5:</b> Safety hazards for people residing or working in the project component areas that are within the area of an airport land use plan or within 2 miles of an airport.	<b>APM HZ-1.</b> See above.	Less Than Significant
<b>Impact HZ-6:</b> Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	<b>MM HZ-2: Construction Fire Control and Emergency Response Measures.</b> To address the risk of fire during construction of the proposed project components, the applicant and SCE will develop fire control and emergency response measures as part of the Construction Safety and Emergency Response Plans developed in consultation with their contractors for use during construction of the proposed project components. The Construction Fire Control and Emergency Response Measures will describe fire prevention and response practices that the applicant and SCE will implement during construction of the proposed project components to minimize the risk of fire, and in the case of fire, provide for immediate suppression and notification. SCE's Construction Fire Control and Emergency Response Measures will also be generally consistent with SCE's Specification E-2005-104, Transmission Line Project Fire Plan (February 21, 2006).  The Construction Fire Control and Emergency Response Measures shall specify that the applicant and SCE, or the respective construction contractors, shall furnish all supervision, labor,	Less Than Significant

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p><u>tools, equipment, and material necessary to prevent starting any fire, control the spread of fires if started, and provide assistance for extinguishing fires started as a result of project construction activities.</u></p> <p><u>Labor shall include the assignment of Fire Risk Managers who will be present at each proposed project component area during construction activities, whose sole responsibility will be to monitor the contractor's fire-prevention activities, and who will have full authority to stop construction in order to prevent fire hazards.</u></p> <p>1. <u>The Fire Risk Managers shall:</u></p> <ul style="list-style-type: none"> <li><u>Be responsible for preventing, detecting, controlling, and extinguishing fires set accidentally as a result of construction activity;</u></li> <li><u>Review the Fire Control and Emergency Response Measures with the fire patrolperson and construction employees prior to starting work at each project area;</u></li> <li><u>Ensure that all construction personnel are trained in fire safety measures relevant to their responsibilities. At a minimum, construction personnel shall be trained and equipped to extinguish small fires;</u></li> <li><u>Be equipped with radio or cell phone communication capability; and</u></li> <li><u>Maintain an updated a key personnel and emergency services contact (telephone and email) list, kept onsite and made available as needed to construction personnel.</u></li> </ul> <p>2. <u>Equipment shall include:</u></p> <ul style="list-style-type: none"> <li><u>a. Spark arresters that are in good working order and meet applicable regulatory standards for all diesel and gasoline internal combustion engines, stationary and mobile;</u></li> <li><u>b. One shovel and one pressurized chemical fire extinguisher for each gasoline-powered tool, including but not restricted to compressors, hydraulic accumulators, gardening tools (such as chain saws and weed trimmers), soil augers, rock drills, etc.;</u></li> <li><u>c. Fire suppression equipment to be kept on all vehicles used for project construction; and</u></li> <li><u>d. An onboard self-extinguishing fire suppression system capable of extinguishing any equipment-caused fire to be kept on heavy construction operating equipment.</u></li> </ul> <p>3. <u>Measures to be undertaken by the applicant, SCE or the respective construction contractors,</u></p>	



Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p><u>and monitored and enforced by the Fire Risk Manager, at each of the project areas during construction activities, shall include:</u></p> <ol style="list-style-type: none"> <li>a. <u>The installation of fire extinguishers at the proposed Central Compressor Station site;</u></li> <li>b. <u>The prohibition of smoking at each construction job site as follows: no smoking in wildland areas; no smoking during operation of light or heavy equipment; limit smoking to paved areas or areas cleared of all vegetation; no smoking within 30 feet of any area in which combustible materials (including fuels, gases, and solvents) are stored; no smoking in any project construction areas during any Red Flag Warnings that apply to the area;</u></li> <li>c. <u>The posting of no smoking signs and fire rules on the project bulletin board at all contractor field offices and areas visible to employees during fire season;</u></li> <li>d. <u>The maintenance of all construction areas in an orderly, safe, and clean manner. All oily rags and used oil filters shall be removed from project construction areas. After construction activities are completed in each project area, the area shall be cleaned of all trash and surplus materials. All extraneous flammable materials shall be cleared from equipment staging areas and parking areas;</u></li> <li>e. <u>Confinement of welding activities to cleared areas having a minimum radius of 10 feet measured from place of welding, and observed by the Fire Risk Manager;</u></li> <li>f. <u>Prevention of the idling of vehicles with hot exhaust manifolds on dirt roads with dead combustible vegetation under the vehicle;</u></li> <li>g. <u>The provision of portable communication devices (i.e., radio or mobile telephones) as needed to construction personnel and communication protocols for onsite workers to coordinate with local agencies and emergency personnel in the event of fire or other emergencies during construction or operation of the proposed project; and</u></li> <li>h. <u>Any additional measures as needed during construction to address fire prevention and detection, to lower the risk of wildland fires.</u></li> </ol> <ol style="list-style-type: none"> <li>4. <u>Measures will also include the following requirements that would involve coordination between the applicant and SCE, and the Fire Departments and CAL FIRE:</u> <ol style="list-style-type: none"> <li>a. <u>The applicant and SCE or the respective construction contractors shall furnish any and all forces and equipment to extinguish any uncontrolled fire near the project component</u></li> </ol> </li> </ol>	

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p><u>areas as directed by Fire Department or CAL FIRE representatives;</u></p> <p>b. <u>The applicant and SCE or the respective construction contractors shall abide by all restrictions to construction activity that may be enforced by the Fire Departments and/or CAL FIRE during Red Flag Warning days; and</u></p> <p>c. <u>In the event that SCE or their respective construction contractor sets fire to incinerate cleared vegetation, the Fire Risk Manager shall notify the Fire Departments and/or CAL FIRE in advance of the burning. Special care shall be taken to prevent damage to adjacent structures, trees, and vegetation. The applicant will not burn cleared vegetation during construction activities.</u></p> <p>5. <u>Measures will also include additional, special provisions for days when the National Weather Service issues a Red Flag Warning. Standard protocols implemented during these periods will include:</u></p> <p>a. <u>Measures to address storage and parking areas;</u></p> <p>b. <u>Measures to address the use of gasoline-powered tools;</u></p> <p>c. <u>Procedures for road closures as necessary;</u></p> <p>d. <u>Procedures for use of a fire guard as necessary; and</u></p> <p>e. <u>Additional fire suppression tools and fire suppression equipment, and training requirements.</u></p>	
<p><b>Impact HZ-7:</b> Expose people or structures to a significant risk involving wildland fires.</p>	<p><b>MM HZ-2.</b> See above.</p> <p><b>MM HZ-32: Fire Department Review and Coordination.</b> Prior to construction of the proposed project components, the applicant and SCE will coordinate with <del>CAL FIRE</del>, the City of Los Angeles Fire Department and the Los Angeles County and Ventura County Fire Departments (Fire Departments) according to the location of the proposed project components, <del>to the satisfaction of the lead agency.</del> The applicant and SCE will submit the following materials ("fire management information") for review by the Fire Departments: proposed project components and design, specific construction methods and equipment, and a description of plans and measures including but not limited to the applicant's Fire/Emergency Action Plan, SCE's Fire Management Plan, the applicant's and SCE's Construction Safety and Emergency Response Plans, and measures that would be undertaken by the applicant and SCE to further address risks involving wildland fires during construction and operation of the proposed project components (including Fire Control and Emergency Response Measures). The Fire Departments will review the</p>	<p>Less Than Significant</p>

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p>applicant and SCE's fire management information prior to construction and operation (as appropriate) of the proposed project components, in accordance with each respective fire department's codes, regulations, ordinances, guidelines, and other policy which may guide such review, including but not limited to:</p> <ol style="list-style-type: none"> <li>1. The County of Los Angeles Fire Code (2011), including permits as required under Chapter 1, Section 105; Chapter 3, Section 325 (Clearance of Brush and Vegetative Growth); Chapter 4 (including Section 404.3.2, Fire Safety Plans, and 408.7.5, Emergency Plan); and Chapter 14 (fire safety during construction and demolition);</li> <li>2. The County of Los Angeles Building Code (2011), which would apply to buildings within the project area that would require plan review from the County of Los Angeles Fire Department; and</li> <li>3. CAL FIRE's <i>Power Line Fire Prevention Field Guide</i> (2008).</li> </ol> <p>The applicant and SCE will also submit the fire management information along with a record of contacts and coordination with the Fire Departments to the CPUC, for review and approval prior to construction of the proposed project components. The Fire Departments will submit written confirmation of the completion of this review to the applicant and SCE prior to project construction and operation. The applicant will also submit any revisions of the facility Fire/Emergency Action Plan related to operation of the Central Compressor Station, for the same level of review and approval, prior to the start of project operations at the storage field.</p>	
<b>Hydrology and Water Quality</b>		
<b>Impact HY-1:</b> Violate water quality standards or waste discharge requirements.	<p>APM AQ-3, APM AQ-4, APM AQ-6. See above.</p> <p>APM BR-3. See above.</p> <p>APM GE-1, APM GE-2. See above.</p> <p>APM HZ-3, APM HZ-4, APM HZ-5. See above.</p> <p>APM PS-1, APM PS-2. See above.</p>	Less Than Significant
<b>Impact HY-2:</b> Substantial depletion of groundwater supplies or substantial interference with groundwater recharge.	<i>No measures required.</i>	Less Than Significant

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
<b>Impact HY-3:</b> Substantial alteration of the existing drainage pattern of the site or area.	APM AQ-3. See above. APM BR-3. See above. MM BR-5. See above. APM GE-2. See above.	Less Than Significant
<b>Impact HY-4:</b> Substantial alteration of the existing drainage pattern or rate or amount of surface runoff in a manner which would result in flooding.	<i>No measures required.</i>	Less Than Significant
<b>Impact HY-5:</b> Create or contribute to runoff water exceeding the capacity of existing or planned storm water drainage systems, or provide substantial additional sources of polluted runoff.	<i>No measures required.</i>	Less Than Significant
<b>Impact HY-6:</b> Other substantial degradation of water quality.	<i>No measures required.</i>	Less Than Significant
<b>Impact HY-7:</b> Project structures would impede or redirect flood flows within a 100-year flood hazard area.	<i>No measures required.</i>	Less Than Significant
<b>Impact HY-8:</b> Risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow.	APM GE-1, APM GE-2. See above.	Less Than Significant
<b>Impact HY-9:</b> Risk of loss, injury or death involving flooding.	<i>No measures required.</i>	Less Than Significant
<b>Land Use and Planning</b>		
<b>Impact LU-1:</b> Physical division of an established community.	<i>No measures required.</i>	Less Than Significant
<b>Impact LU-2:</b> Conflict with applicable plans, policies, or regulations.	<i>No measures required.</i>	Less Than Significant
<b>Impact LU-3:</b> Conflict with habitat conservation or natural community conservation plans.	<i>No measures required.</i>	Less Than Significant

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
<b>Noise</b>		
<b>Impact NS-1:</b> Noise levels in excess of standards established in the local general plan or noise ordinance.	<p><b>APM NS-1: Construction Hours.</b> The applicant and SCE will ensure that construction of the proposed project components will comply with all applicable City of Los Angeles, City of Santa Clarita, County of Los Angeles, and County of Ventura noise regulations. Construction activities will generally be scheduled during daylight hours (7:00 a.m. to 5:00 p.m.) Monday through Friday and some Saturdays.</p> <p><b>APM NS-2: Construction Noise Control Plan.</b> SCE will prepare and implement a noise control plan to address all SCE structure installation/replacement and substation modifications associated with the SCE-proposed project components. Construction measures required by the Noise Control Plan will include, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>• Stockpiling and vehicle staging areas will be located as far away from occupied residences as possible;</li> <li>• All stationary construction equipment will be operated as far away from residential uses as possible;</li> <li>• To the extent feasible, haul routes for removing excavated materials or delivery of materials from each respective project component site will be designed to avoid residential areas and areas occupied by residential receptors (e.g., hospitals, schools, convalescent homes, etc.); and</li> <li>• Idling construction equipment will be turned off when not in use for periods longer than 15 minutes.</li> </ul> <p><b>APM NS-3: Notification Procedures.</b> At least two weeks prior to construction, the applicant and SCE will notify all <del>sensitive receptors</del> <u>property owners</u> within 300 feet of construction activities <del>of the potential to experience significant noise levels during construction.</del></p> <p><b>MM NS-1: Noise Reduction and Control Practices.</b> SCE will employ the following noise reduction and control practices during subtransmission line reconductoring and fiber optic installation activities that could produce noise levels above 80 dBA <math>L_{eq}</math> near sensitive receptors (within 100 feet):</p> <ul style="list-style-type: none"> <li>• Construction equipment, stationary or mobile, will be equipped with properly operating and maintained mufflers on engine exhausts and compressor components.</li> <li>• Construction equipment specifically designed for low noise emissions (i.e., equipment that is</li> </ul>	Less Than Significant

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<p>powered by electric or natural gas engines instead of diesel or gasoline reciprocating engines) will be used as much as feasible. Electric engines have been reported to have lower noise levels than internal combustion engines.</p> <ul style="list-style-type: none"> <li>• Temporary enclosures or acoustic barriers (i.e., solid sound absorber composite materials) will be used around stationary pieces of equipment. Noise barriers or enclosures will be selected with a sound transmission class of 30 or greater, in accordance with American Society of Testing and Materials Test Method E90. Acoustical curtain enclosures can provide a sound transmission loss of 10 to 13 dBA, whereas portable solid barriers can achieve up to 33 dBA in noise reduction. Acoustic barriers will be used for all construction activities within 100 feet of closest receptors.</li> <li>• Construction traffic will be routed away from residences and other sensitive receptors, as feasible.</li> <li>• Noise from back-up alarms (alarms that signal vehicle travel in reverse) in construction vehicles and equipment will be reduced by providing a layout of construction sites that minimizes the need for back-up alarms and using flagmen to minimize time needed to back up vehicles. As feasible, and in compliance with the applicant's safety practices and public and worker safety provisions required in the Occupational Safety and Health Standards for the Construction Industry (29 CFR Part 1926), the applicant may also use self-adjusting, manually adjustable, or broadband back-up alarms to reduce construction noise.</li> </ul> <p><b>MM NS-2: Helicopter Use Notification Procedures.</b> SCE will perform broad-based public outreach, using methods such as a combination of direct mail and media press releases, to provide project background and specific information concerning project construction helicopter use, including construction schedule, hours, duration, and location. At a minimum, SCE will include the City of Santa Clarita in this outreach, and will assist City staff as needed by providing or facilitating links from SCE web-based project information to an appropriate location on the City's website.</p> <p><b>MM NS-32: Operational Noise Control.</b> After construction of the Central Compressor Station is completed, the applicant will take measures as necessary to ensure that the operational noise levels from the Central Compressor Station do not exceed 45 dBA at the closest receptor in the City of Los Angeles. Measures that may be implemented to achieve this level during the operational phase for turbines, compressors, and cooling equipment proposed to be installed at the Central Compressor Station could include:</p>	

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
	<ul style="list-style-type: none"> <li>Turbines will be placed within an acoustical enclosure;</li> <li>Compressor noise will be mitigated by placing an acoustical blanket over the compressor itself or enclosing the compressor within an appropriately rated acoustical building;</li> <li>Noise emitted from gas process coolers will be mitigated by installing acoustic barriers without gaps around the equipment casing and with a continuous minimum surface density of 10 kilograms per square meter in order to minimize the transmission of sound.</li> </ul> <p><u>In order to ensure that operational noise levels from the Central Compressor Station do not exceed 45 dBA at the closest receptor in the City of Los Angeles, the applicant will conduct noise surveys to measure noise levels at the location of the closest receptor in the City of Los Angeles (or a public location near this receptor and between the receptor and the storage facility site) during conditions when operations at the Central Compressor Station produce the highest noise levels (i.e., during time periods when gas injection and withdrawal are taking place at the maximum rate). Noise surveys will be conducted during initial start-up and testing of the Central Compressor Station, and as needed to confirm that plant operations and any required mitigation reduce operational noise to less than 45 dBA at the closest receptor in the City of Los Angeles.</u></p>	
<b>Impact NS-2:</b> Excessive groundborne vibration or groundborne noise levels.	<i>No measures required.</i>	Less Than Significant
<b>Impact NS-3:</b> Permanent increase in ambient noise levels in the project vicinity.	<p><u>MM NS-4: Install Polymer Insulators on 66-kV Subtransmission Line.</u> SCE will install polymer (silicon rubber) insulators on the two lines proposed to be modified on the 66-kV subtransmission system.</p> <p>MM NS-2. See above.</p>	Less Than Significant
<b>Impact NS-4:</b> Substantial temporary or periodic increase in ambient noise levels in the project vicinity.	<p>APM NS-1, APM NS-2, and APM NS-3. See above.</p> <p>MM NS-1 and MM NS-2. See above.</p>	Less Than Significant
<b>Population and Housing</b>		
<b>Impact POP-1:</b> Indirectly induce substantial population growth in an area through extension of roads or other infrastructure.	<i>No measures required.</i>	Less Than Significant

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
<b>Public Services and Utilities</b>		
<b>Impact PS-1:</b> Result in substantial adverse physical impacts associated with new or physically altered governmental facilities.	MM HZ-2 and MM HZ-3. See above.	Less Than Significant
<b>Impact PS-2:</b> Require or result in the construction of new water facilities or expansion of existing facilities.	<i>No measures required.</i>	Less Than Significant
<b>Impact PS-3:</b> Require or result in the construction of new storm water drainage facilities or expansion of existing facilities.	<i>No measures required.</i>	Less Than Significant
<b>Impact PS-4:</b> Insufficient water supplies available to serve the proposed project from existing entitlements and resources, or require new or expanded entitlements.	<i>No measures required.</i>	Less Than Significant
<b>Impact PS-5:</b> Served by a landfill without sufficient permitted capacity to accommodate the proposed project's solid waste disposal needs.	<b>APM PS-2: Nonhazardous Waste Management.</b> The applicant and SCE will ensure that nonhazardous waste materials, including wood, soil, vegetation, and sanitation waste (portable toilets) that would be generated during construction of the project components will either be re-used at the project component construction sites (e.g., clean soil used for backfill) or disposed of at an appropriately licensed offsite facility.  <b>APM HZ-5, APM HZ-7.</b> See above.	Less Than Significant
<b>Impact PS-6:</b> Noncompliance with federal, state, or local statutes and regulations related to solid waste.	<b>APM PS-1: Site Cleanup.</b> The applicant and SCE will direct construction contractors to perform initial site cleanup immediately following construction activities at each of the proposed project components. Initial site cleanup at each project component area will include the following: <ul style="list-style-type: none"> <li>• Removal of all construction debris;</li> <li>• Proper disposal or recycling of all construction materials and debris at appropriately licensed landfills and other offsite facilities; and</li> </ul> Inspection of project component sites to ensure that cleanup activities are successfully completed.  <b>APM HZ-5.</b> See above.  <b>APM PS-2.</b> See above.	Less Than Significant



Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
<b>Recreation</b>		
<b>Impact RE-1:</b> <u>Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.</u>	<i>No measures required.</i>	Less Than Significant
<b>Transportation and Traffic</b>		
<b>Impact TT-1:</b> Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.	<p><b>APM TT-1: Traffic Control Plan.</b> The applicant and SCE will prepare Traffic Control Plans in accordance with the latest version of the California Joint Utility Traffic Control Manual. These Traffic Control Plans will be implemented by the applicant and SCE as needed. The Traffic Control Plans will be developed to minimize short-term construction-related impacts on local traffic and potential traffic safety hazards, and will include measures such as the installation of temporary warning signs at strategic locations near access locations for the project components. The signs will be removed after construction-related activities are completed. The Traffic Control Plans may include the following measures:</p> <ul style="list-style-type: none"> <li>• Coordination with the City of Los Angeles, City of Santa Clarita, County of Los Angeles, or County of Ventura on any temporary land or road closures;</li> <li>• Installation of traffic control devices as specified in the California Joint Utility Traffic Control Manual;</li> <li>• Provisions for temporary alternate routes to route local traffic around construction zones; and</li> </ul> <p>Consultation with emergency service providers and development of an Emergency Access Plan for emergency vehicle access in and adjacent to the construction zone.</p> <p><b>APM TT-3: Commuter Plan.</b> The applicant would implement a Commuter Plan that includes a designated offsite parking area that has adequate parking capacity for 150 workers (the peak construction-activity maximum not including SCE workers) and a shuttle that would transport worker crews (approximately 10 workers per trip) from the parking area to worksites.</p>	Less Than Significant

Table 4-1 Summary of Impacts

Impact	Applicant Proposed Measures And Mitigation Measures	Level of Significance w/Mitigation
<b>Impact TT-2:</b> Conflict with an applicable congestion management program including, but not limited to, LOS standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.	APM TT-1 and APM TT-3. See above.	Less Than Significant
<b>Impact TT-3:</b> Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	APM TT-1. See above.	Less Than Significant
<b>Impact TT-4:</b> Result in inadequate emergency access.	APM TT-1 and APM TT-3. See above.  <u>MM TT-1: City of Santa Clarita Traffic Engineer Review. Prior to commencing work within Santa Clarita city boundaries, SCE will submit their Traffic Control Plan for the project to the City of Santa Clarita traffic engineer, and incorporate any recommendations from this review into the Traffic Control Plan.</u>	Less Than Significant
<b>Impact TT-5:</b> Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.	AMPM TT-1 and APM TT-2. See above.  MM TT-1. See above.	Less Than Significant
<b>Cumulative and Other CEQA Considerations</b>		
<i>No impacts identified.</i>	<i>No measures required.</i>	NA

## 5.0 Mitigation Monitoring, Compliance, and Reporting Program

The purpose of this Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) is to ensure effective implementation of the applicant proposed measures (APMs) and mitigation measures required by the California Public Utilities Commission (CPUC) that Southern California Gas Company (the applicant) and Southern California Edison (SCE) have agreed to implement as part of the Aliso Canyon Turbine Replacement Project (the proposed project). The MMCRP, which is outlined in Table 5-1, includes:

- Each impact evaluated in the Environmental Impact Report (EIR);
- APMs and mitigation measures that the applicant and SCE are required to implement as part of the proposed project;
- Compliance documentation and consultation requirements for each APM and mitigation measure;
- Monitoring requirements; and
- Timing for implementation of the APMs and mitigation measures.

A CPUC-designated environmental monitor (or monitors) will monitor construction of the proposed project to ensure full implementation of each APM and mitigation measure. In all instances where non-compliance occurs, the CPUC's designated environmental monitor will issue a warning to the construction supervisor and the applicant's or SCE's project manager. Continued non-compliance will be reported to the CPUC's designated project manager. Any decisions to halt work due to non-compliance will be made by CPUC staff. The CPUC staff-designated environmental monitor will keep a record of any incidents of non-compliance with mitigation measures, APMs, or other conditions of project approval. Copies of these documents will be supplied to the applicant, SCE, and CPUC staff.

This MMCRP would be finalized and further, project construction-related details will be added to the MMCRP, if the Commission approves the revised project.

### 5.1 Regulatory Background

Under CEQA Guidelines Section 15097, the Lead Agency (in this case, CPUC) is responsible for developing a mitigation monitoring or reporting program to ensure that all project revisions and mitigation measures described in the findings associated with approval of the project are implemented. Monitoring refers to the ongoing or periodic process by which project construction and operation are overseen by the lead agency, and ensures that the applicant's compliance with project conditions is checked on a regular basis. Reporting, which comprises written reviews of the applicant's compliance with APMs and mitigation measures presented to the decision-making body or a designated staff person, ensures that the lead agency is informed of compliance with APMs and mitigation measures. The CPUC views the MMCRP as a working guide to facilitate not only the implementation of APMs and mitigation measures by the applicant, but also the monitoring, compliance, and reporting activities of the CPUC and its monitors. The CEQA Guidelines encourage cooperation in mitigation monitoring and reporting between lead and responsible agencies, where possible.

## **5.2 Roles and Responsibilities**

This subsection outlines roles and responsibilities specific to the MMCRP. Further, more specific details regarding project roles will be included in the Final MMCRP.

### **5.2.1 CPUC Project Manager and Compliance Managers and Monitors**

The CPUC Project Manager will assign monitoring and reporting responsibilities to a third-party contractor as described below and will oversee the work of the third-party contractor through review of weekly and monthly status reports. The CPUC Project Manager will be notified of non-compliance situations and may suggest measures to help resolve the issue(s). All requests for minor project refinements will be submitted to the CPUC Project Manager for review and approval.

The CPUC will assign monitoring and reporting responsibilities to a third-party contractor that reports to the CPUC Project Manager. The third-party contractor designated by the CPUC will assign a Compliance Manager (CPUC Compliance Manager) as the designated point of contact. The CPUC Compliance Manager will report to the CPUC Project Manager. The CPUC Compliance Manager will consult with the CPUC Project Manager to determine the appropriate level of inspection frequency, and will also oversee one or more Compliance Monitors, the on-the-ground personnel responsible for observing and reporting compliance with the terms and conditions of the CPUC Certificate of Public Convenience and Necessity. The number of Compliance Monitors and frequency of site inspections will depend on the number of concurrent construction activities and their locations. The CPUC Compliance Manager will be an integral part of the project team and will stay apprised of construction activities, schedule changes, and construction progress. The Compliance Monitors and Compliance Manager will document compliance through daily site inspection forms, the use of a table tracking APMs and mitigation measures, and monthly reports to the CPUC Project Manager.

### **5.2.2 Construction Personnel**

#### **Applicant and SCE Construction Management Teams**

The applicant's and SCE's construction management teams would oversee, manage, and coordinate with the Construction Contractor to ensure overall project construction is completed as required by the project conditions and contract, and within the schedule. The construction management teams ensure that APMs and mitigation requirements are implemented and that work stoppages are appropriately communicated and coordinated.

#### **Construction Contractor**

The Construction Contractors would provide daily construction work schedules and would describe the number, types, and activities of the construction scheduled to occur to ensure adequate monitoring resources are provided. The Construction Contractors would also report deviations from compliance and spills (e.g., fuel or water) to the Compliance Monitors.

The Construction Contractors would have significant responsibilities for compliance with the environmental requirements of the project. The Contractors would be responsible for incorporating all project environmental requirements into daily construction activities.

Key environmental responsibilities for Contractors include, but are not limited to:

- Verifying that all construction workers attend the project environmental training program prior to beginning work;
- Reviewing and understanding the environmental requirements; and
- Implementing environmental protection requirements and conditions during construction and maintaining compliance with project requirements.

### **5.2.3 Monitoring**

As the Lead Agency under CEQA, the CPUC is required to monitor the project to ensure that the APMs and mitigation measures are implemented. The CPUC would have primary responsibility for ensuring full compliance with the provisions of the monitoring program. The Compliance Monitors, under the supervision of the CPUC Compliance Manager, would monitor construction activities in the project areas on a regular basis, particularly when construction activities have the potential to impact a sensitive resource.

The applicant and SCE may elect to have one or more full-time environmental monitors on site on a daily basis to coordinate specialty monitors (such as biologists and archeologists), assist construction crews with interpreting APMs and mitigation measures, and help correct compliance problems in a timely manner. Environmental monitors would also provide environmental training through the Worker Environmental Awareness Program.

### **5.2.4 Enforcement**

The CPUC is responsible for enforcing the procedures adopted for monitoring through the CPUC Compliance Monitors operating under the supervision of the CPUC Compliance Manager. The CPUC Compliance Monitors would note problems with monitoring, notify designated project members, and report the problems to the CPUC Project Manager.

The CPUC has the authority to halt any construction activity associated with the project if the activity is determined to be a deviation from the approved project or adopted APMs and mitigation measures.

### **5.2.5 Mitigation Compliance**

The applicant and SCE are responsible for successfully implementing all the adopted APMs and mitigation measures listed in the MMCRP. The applicant and SCE shall inform the CPUC and their monitors in writing of any mitigation measures that are not or cannot be successfully implemented. The CPUC, in coordination with the monitors, will assess whether alternative mitigation is appropriate and specify to the applicant and/or SCE any required subsequent actions.

## **5.3 Communication**

Communication is a critical component of a successful environmental compliance program. In order to avoid project delays and possible work stoppages, environmental and construction representatives would need to interact regularly and maintain professional, responsive communications at all times. Similarly, representatives of the applicant and SCE would need to coordinate closely with the Compliance Monitors to address and resolve issues in a timely manner. A communication protocol to accurately disseminate information regarding on-going surveys and mitigation measures, construction activities, contractors, and

planned or upcoming work to all levels of the project would be established as part of the Final MMRCPP prior to the commencement of construction.

### **5.3.1 Monthly Environmental Compliance Report**

The applicant and SCE would prepare and distribute a monthly environmental compliance report for distribution to key project members, including the CPUC. The CPUC Compliance Manager would review the monthly report to ensure that the status of APMs and mitigation measures is consistent with observations in the field. The monthly environmental compliance report will also be a tool to keep all parties informed of construction progress and schedule changes.

### **5.3.2 Coordination with Other Agencies**

Several local, state, and federal agencies have jurisdiction over portions of the land in the project area. In addition, some APMs and mitigation measures were derived from specific agency input. The applicant and SCE would be responsible for contacting agencies and immediately notifying them of compliance issues within their jurisdiction. The CPUC Compliance Manager may request copies of email correspondences, phone logs, or other documentation between the applicant or SCE and agencies to avoid direct involvement of Compliance Monitors. However, if an issue regarding compliance with an APM, mitigation measure, or permit requirement under the jurisdiction of an agency remains unresolved, the Compliance Monitors may elect to contact the agency to discuss resolution.

## **5.4 Minor Project Refinements**

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

### **5.4.1 Minor Project Refinements Request Process**

Requests for CPUC staff approval of a refinement must be made in writing and should include the following:

- A detailed description of the proposed refinement or refinements, including an explanation of why the refinements are necessary;
- Identification of the APMs, mitigation measures, project parameter, or other project stipulation for which the refinements are being requested, and a reference to the approved documents;
- Photos, maps, and other supporting documentation illustrating the difference between the existing conditions in the project area, the approved project, and the proposed refinements;
- The potential impacts of the proposed refinements, including a discussion of each environmental issue area that could be affected by the refinements with accompanying verification that there would be no increase in significant impacts on resources affected by the project and no new significant impacts, after application of previously adopted mitigation;
- Whether the refinements conflict with any APMs or mitigation measures;

- Whether the refinements conflict with any applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy;
- Water/wetland/stormwater-related resource information if the refinements 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; and
- The date of expected construction at the refinements site area.

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

#### **5.4.2 Requirements for Staff Approval of Minor Refinements**

To be approved by staff, refinements must meet all of the following fixed standards. Refinements must not:

- Be outside the geographic boundary of the study area utilized in the CEQA document;
- Create a new significant impact or a substantial increase in the severity of a previously identified significant impact, based on the thresholds used in the environmental document;
- Trigger additional permit requirements;<sup>1</sup>
- Conflict with any APMs or mitigation measures or any applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy; or
- Require new conditions for approval, without which the refinements would result in a new significant impact or a substantial increase in the severity of a previously identified significant impact.

Examples of refinements that may be approved by staff after final engineering include, but are not limited to:

- Adding a temporary extra work area (no more than 60 days of use) or substituting a work area, including lay-down and staging, for another work area that is as suitable as or more suitable than the originally proposed work area. The temporary extra work area or substitute work area must be located in a disturbed area with no sensitive resources or sensitive land uses adjacent to the proposed area, must not create any permanent impacts, and must be restored to either its initial condition<sup>2</sup> or an improved condition.<sup>3</sup>
- Adjusting the alignment of a project within the study area that was utilized in the original environmental analysis to avoid unanticipated impacts related to cultural artifacts, buried utility infrastructure, hazardous and toxic substances, and other land use impacts including effects on homeowners, so long as the adjustment does not create a new significant impact or a substantial increase in the severity of a previously identified significant impact.

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<sup>1</sup> For example: grading, disposal, water discharge, dredging, a Clean Water Act Section 404 permit or a California Fish and Game Code Section 1602 Lake or Streambed Alteration Agreement.

<sup>2</sup> The initial condition of the area is the condition prior to its use as a work area.

<sup>3</sup> For example, trash has been cleaned up that was originally on the site or the site is replanted with native vegetation.

- Adjusting the alignment of a project within the study area that was utilized in the original environmental analysis to avoid or adapt to conditions on the ground that vary from the conditions that existed at the time of the original environmental analysis, so long as the adjustment does not create a new significant impact or a substantial increase in the severity of a previously identified significant impact.

## 5.5 Dispute Resolution

The following procedure will be observed for dispute resolution:

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

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

## 5.6 Mitigation, Monitoring, Compliance, and Reporting Program

Table 5-1 presents the MMRP, which incorporates all changes to the proposed project and mitigation measures that were made as a result of public review of the Draft EIR and further consideration of the proposed project by the CPUC. If the proposed project is approved by the Commission, CPUC staff will compile the Final MMRP based on this table and the final project conditions.

Table 5-1 is the core document for environmental requirements on the project and will be the primary guideline for determining compliance with the MMRP. A copy of the table should be kept with each crew working on the project, and all supervisory staff working on the project should be familiar with its contents. CPUC staff would use a modified version of the MMRP table to accurately track the status of APMs and mitigation measures, and will also be used by the applicant’s and SCE’s Environmental Monitors, Compliance Monitors, project managers, supervisory staff, and other members of the project team.



### **5.6.1 Effectiveness Review**

The CPUC may conduct a comprehensive review of conditions that are not effectively mitigating impacts at any time it deems appropriate, including as a result of the Dispute Resolution procedure outlined in subsection 5.2. If the CPUC determines that, based on the review, any conditions are not adequately mitigating significant environmental impacts caused by the project, the CPUC may impose additional reasonable conditions to effectively mitigate these impacts. These reviews will be conducted in a manner consistent with the Commission's rules and practices.

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Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
<b>4.1 Aesthetics</b>				
<b>Impact AE-4:</b> <i>Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area</i>	<b>APM AE-1: Night Lighting.</b> The applicant and SCE will ensure that construction activities occurring at night will use lighting to protect the safety of the construction workers but orient the lights to minimize their effect on any nearby sensitive receptors. The lighting will be directed downward and shielded to eliminate offsite light spill at times when the lighting might be in use.	CPUC monitor: Line item in monthly report	During construction (nighttime)	Applicant, SCE, and CPUC  * Applicable to all project components during nighttime construction
<b>4.2 Agriculture</b>				
No applicable APMs or mitigation measures.				
<b>4.3 Air Quality</b>				
<b>Impact AQ-3:</b> <i>Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment.</i>	<b>APM AQ-1: Maintain Engines in Good Working Condition.</b> The applicant and SCE will ensure that equipment engines will be maintained in good condition and in proper tune as per the manufacturers' specifications.	CPUC monitor: Line item in monthly report	During construction	Applicant, SCE, and CPUC  * Applicable to all project components
	<b>APM AQ-2: Minimization of Equipment Use.</b> The applicant and SCE will ensure that staff and daily construction activities will be efficiently scheduled to minimize the use of unnecessary/duplicate equipment when possible.	CPUC monitor: Line item in monthly report	During construction	Applicant, SCE, and CPUC  * Applicable to all project components

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<b>APM AQ-3 Minimization of Disturbed Areas.</b> The applicant and SCE will ensure that the amount of area disturbed by clearing, grading, earth-moving, or excavation operations is minimized to reduce the amount of fugitive dust that is generated during construction in a manner that meets or exceeds the requirements of the South Coast Air Quality Management District's Rule 403 (Fugitive Dust Regulations).	CPUC monitor: Line item in monthly report	During construction	Applicant, SCE, and CPUC  * Applicable to all project components
	<b>APM AQ-4: Watering Prior to Grading and Excavation.</b> The applicant and SCE will ensure that pre-grading/excavation activities will include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water (preferably reclaimed, if available) will penetrate sufficiently to minimize fugitive dust during grading activities.	CPUC monitor: Line item in monthly report	During construction	Applicant, SCE, and CPUC  * Applicable to all project components
	<b>APM AQ-5: Vehicle Speed Limits.</b> The applicant will post signs in the storage field along designated travel routes limiting traffic to 15 miles per hour or less on unpaved roads.	a. Map showing locations of signs posted b. CPUC monitor: Line item in monthly report	a. Prior to construction b. During construction	Applicant and CPUC  * Applicable to storage field project components
	<b>APM AQ-6: Fugitive Dust from High Winds.</b> During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), the applicant and SCE will ensure that all clearing, grading, earth moving, and excavation operations during project construction will be curtailed to the degree necessary to prevent fugitive dust created by onsite activities and operations from being a nuisance or hazard, either offsite or onsite.	CPUC monitor: Line item in monthly report	During construction	Applicant, SCE, and CPUC  * Applicable to all project components
	<b>APM AQ-7: Cleaning of Paved Roads.</b> The applicant will ensure that paved road surfaces will use vacuum sweeping and/or water flushing to remove buildup of loose material to control dust emissions from travel on paved access roads (including adjacent public streets impacted by construction activities) and paved parking areas.	CPUC monitor: Line item in monthly report	During construction	Applicant, SCE, and CPUC  * Applicable to all project components

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<p><b>MM AQ-1: Construction Emission Reduction Measures.</b> The applicant and SCE will implement the following emission reduction measures for all construction activities:</p> <ol style="list-style-type: none"> <li>1. Ensure that all off-road diesel-powered construction equipment with engines greater than 50 horsepower (hp) are compliant with Tier 3 off-road emissions standards where available. In the event equipment with a Tier 3 engine is not available for any off-road engine larger than 50 hp, that engine shall be operated with tailpipe retrofit controls that reduce exhaust emissions of NO<sub>x</sub> and PM to no more than Tier 3 emission levels.</li> <li>2. Equipment with an engine not compliant with the Tier 3 standard will be allowed on a case-by-case basis only when the applicant or SCE has documented that no Tier 3 equipment (or emissions equivalent retrofit equipment) is available for a particular equipment type. Each case shall be documented with signed written correspondence by the appropriate construction contractor, along with documented correspondence from at least two construction equipment rental firms representing a good faith effort to locate engines that meet Tier 3 requirements. Documentation will be submitted to CPUC staff for review before equipment is used on the project.</li> <li>3. Make available to CPUC staff and/or construction monitors a copy of each piece of construction equipment's certified tier specification, BACT documentation, and/or CARB or SCAQMD operating permit, as applicable, at the time of mobilization of each applicable unit of equipment.</li> </ol>	<ol style="list-style-type: none"> <li>a. Listing of proposed construction equipment, including details such as equipment type, age, hp, certified tier specification, emissions control devices/BACT, and CARB/SCAQMD operating permit</li> <li>b. For each piece of equipment not compliant with Tier 3 standard, documentation that no Tier 3 equipment is available for a particular equipment type</li> <li>c. CPUC monitor: Line item in monthly report</li> </ol>	<ol style="list-style-type: none"> <li>a. Prior to and during construction</li> <li>b. Prior to construction</li> <li>c. Prior to and during construction</li> </ol>	<p>Applicant, SCE, and CPUC</p> <p>* Applicable to all project components</p>

	MM AQ-2: Measures to Reduce NO <sub>x</sub> Emissions. Prior to	a. Proposed measures to	a. Prior to	Applicant, SCE, and
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Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<p>construction, the applicant and SCE will submit proposed additional measures to reduce daily emissions of NO<sub>x</sub> to CPUC staff for review and approval. Measures may include the following:</p> <ol style="list-style-type: none"> <li>1. The use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export) or the use of trucks that meet EPA 2007 model year NO<sub>x</sub> emissions requirements if 2010 model year or newer diesel trucks cannot be obtained.</li> <li>2. A requirement that, during project construction, all construction equipment will be outfitted with BACT devices certified by CARB and that achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.</li> <li>3. Other measures as determined appropriate by the applicant and SCE in consultation with the SCAQMD.</li> </ol> <p>As applicable, the applicant and SCE will calculate estimated emissions of NO<sub>x</sub> that would still exceed the SCAQMD daily threshold after implementation of MM AQ-2 and will submit these calculations to CPUC staff for review prior to construction.</p>	<p>reduce daily emissions of NO<sub>x</sub>; documentation confirming level to which measures would reduce daily NO<sub>x</sub> emissions</p> <ol style="list-style-type: none"> <li>b. Monthly reporting (Monitoring Plan) on actual construction NO<sub>x</sub> emissions and implementation of measures to reduce emissions (unless Mitigation Agreement addresses all NO<sub>x</sub> exceedances)</li> <li>c. CPUC monitor: Line item in monthly report</li> </ol>	<p>construction (30 days)</p> <ol style="list-style-type: none"> <li>b. During construction (monthly)</li> <li>c. Prior to and during construction</li> </ol>	<p>CPUC</p> <p>* Applicable to all project components</p>
	<p><b>MM AQ-3: Mitigation Agreement for Purchase of Oxides of Nitrogen (NO<sub>x</sub>) Credits.</b> Unless the applicant and SCE can demonstrate through the implementation of on-site emission reduction measures (MMs AQ-1 and AQ-2) that project emissions of NO<sub>x</sub> would not exceed the SCAQMD daily emission threshold, the entire amount of emissions of NO<sub>x</sub> due to construction of the proposed project over this threshold will be mitigated through the offset of every pound of NO<sub>x</sub> emissions in excess of the SCAQMD daily significance threshold of 100 pounds per day. The offset of NO<sub>x</sub> emissions will be accomplished through the purchase of either Regional Clean Air Incentive Market Trading Credits (RTCs), Mobile Source Emission Reduction Credits (MSERCs), or a combination of RTCs and MSERCs.</p> <p>The total amount of NO<sub>x</sub> RTCs and/or MSERCs to be purchased</p>	<ol style="list-style-type: none"> <li>a. Documentation confirming that Mitigation Agreement to reduce NO<sub>x</sub> to less-than-significant levels has been reviewed and approved by the SCAQMD.</li> <li>b. Same as item 2. in MM AQ-2 (monthly reporting on NO<sub>x</sub> emissions/monitoring plan)</li> <li>c. CPUC monitor: Line item in monthly report</li> </ol>	<ol style="list-style-type: none"> <li>a. Prior to construction (30 days)</li> <li>b. During construction (monthly)</li> <li>c. During construction</li> </ol>	<p>Applicant, SCE, and CPUC</p> <p>* Applicable to all project components</p>

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<p>will be calculated when the construction schedule and operating conditions are finalized. The applicant and SCE will prepare a Mitigation Agreement that outlines the proposed purchase of the required RTCs and/or MSERCs. The Mitigation Agreement will be submitted to CPUC staff and SCAQMD prior to the start of project construction. The SCAQMD may require that the Mitigation Agreement be presented before and reviewed by the SCAQMD Governing Board. The Mitigation Agreement and associated credits will meet the following criteria:</p> <ol style="list-style-type: none"> <li>The applicant and/or SCE must demonstrate that the emission credits were derived from emission reduction project(s) through existing SCAQMD protocols.</li> <li>The credits will be current for the time the project takes place (i.e., the RTCs and/or MSERCs must not expire before or during the time period when the emissions from the project would occur).</li> <li>The applicant and SCE will retire the entire amount of NO<sub>x</sub> emission credits needed to mitigate the exceedance of the construction significance threshold for NO<sub>x</sub> emissions prior to commencement of project construction.</li> </ol> <p>All emission credits used to mitigate significant air quality impacts from construction of the proposed project will adhere to the SCAQMD's CEQA policies and procedures document titled <i>Revised CEQA Policy and Procedures in Allowing the Use of Emissions Credits to Mitigate Significant Air Quality Impacts from Construction</i>, including procedures for addressing a situation in which NO<sub>x</sub> emissions exceed the original estimation, recordkeeping and reporting, and other procedures. The applicant will also track actual daily emissions during construction according to a monitoring plan that includes records of equipment and vehicle usage, and submit the results of this tracking to CPUC staff on a monthly basis.</p>			
4.4 Biological Resources				

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
<i>Impact BR-1: Substantial adverse direct or indirect effect on special status species.</i>	<i>Coastal California Gnatcatcher Habitat (Including Critical Habitat)</i>			
	APM AQ-3: Minimization of Disturbed Areas. See above.			
	APM AQ-4: Watering Prior to Grading and Excavation. See above.			
	<b>APM BR-1a: Preconstruction Surveys.</b> Prior to construction and activities that may include vegetation clearing, staging and stockpiling, or other activities with the potential to directly or indirectly affect wildlife, the applicant and SCE will ensure that preconstruction surveys are conducted by qualified biologists for sensitive biological resources, including special-status wildlife and special-status plant species, in the project component areas, including access roads and staging areas.	<ul style="list-style-type: none"> <li>a. Biologist (including botanist) qualifications</li> <li>b. Notification of planned surveys</li> <li>c. Survey report, including maps of vegetation communities in the project area (including all native vegetation, riparian vegetation, and vegetation that provides potential habitat for coastal California gnatcatcher)</li> <li>d. CPUC monitor: Line item in monthly report</li> </ul>	<ul style="list-style-type: none"> <li>a. At least one week prior to conducting surveys</li> <li>b. At least one week prior to surveys and per survey windows timing</li> <li>c. Within three weeks after surveys are completed and at least two weeks prior to construction</li> <li>d. During construction</li> </ul>	<p>Applicant, SCE, and CPUC</p> <p>* Applicable to all project components</p>
	<b>APM BR-1b: Exclusionary Fencing to Protect Special-Status Wildlife and Plants.</b> In the event that special-status wildlife and special-status plants are identified within a proposed project component area or vicinity (survey buffer), buffers will be	<ul style="list-style-type: none"> <li>a. Biologist qualifications</li> <li>b. Maps showing the proposed fencing areas</li> </ul>	<ul style="list-style-type: none"> <li>a. At least one week prior to fencing activities</li> </ul>	Applicant, SCE, and CPUC



Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	established by temporary flagging or fencing (this distance may be greater depending on the species and construction activity, as determined by the biologist) between the identified resource and construction activities. Flagging and fencing will be performed or supervised by a qualified biologist to ensure that these activities are conducted without harm to sensitive species, or habitat flagging and fencing will be performed or supervised by a qualified biologist to ensure that these activities are conducted without harm to sensitive species or habitat. The information gathered from these surveys will be used to determine project planning and minimize impacts on sensitive resources from project-related activities. In addition, the results of these surveys will be used to determine the extent to which environmental specialist construction monitors will be required.	c. CPUC monitor: Line item in monthly report	b. At least 3 days prior to construction activities that would take place near the fenced area  c. During construction	* Applicable to all project components
	<b>APM BR-1c: Nesting Bird Surveys.</b> For nesting birds, a field survey will be conducted by a qualified biologist to determine if active nests of bird species protected by the Migratory Bird Treaty Act and/or the California Fish and Game Code are present in the construction zone or within a minimum of 100 feet (500 feet for raptors) of the construction zone. In the event of the identification of nesting birds within a proposed project component area or vicinity, a minimum 50-foot exclusionary buffer will be established by temporary flagging or fencing (this distance may be greater depending on the bird species and construction activity, as determined by the biologist) between the nest site and construction activities. Clearing and construction within the fenced area will be postponed or halted (except for vehicle traffic on existing roads), at the discretion of the biological monitor, until the nest is vacated and juveniles have fledged.	a. Biologist qualifications b. Notification of planned surveys c. Survey report d. Maps showing the proposed flagging or fencing areas e. CPUC monitor: Line item in monthly report	a. At least one week prior to conducting surveys b. At least one week prior to surveys and per survey windows timing c. Within three weeks after surveys are completed and at least two weeks prior to construction	Applicant, SCE, CPUC, CDFW, USFWS  * Applicable to all project components
			d. At least 3 days prior to construction activities that would take place	

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
			near the fenced area and/or as stipulated in Nesting Bird Management Plans (see MM BR-8) e. During construction	
	<b>APM BR-1d: Construction Monitoring.</b> The biologist shall serve as a construction monitor during those periods when construction activities occur near active nest areas to ensure that no inadvertent impacts on these nests will occur. Biological monitoring will be conducted during construction work in areas in close proximity to native habitat to assure project compliance with all APMs and Mitigation Measures.	a. Biologist qualifications b. Brief report of monitoring activities c. CPUC monitor: Line item in monthly report	a. At least one week prior to construction b. As stipulated in Nesting Bird Management Plans (see MM BR-8) or by CPUC monitor c. During construction	Applicant, SCE, CPUC, CDFW, USFWS  * Applicable to all project components

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<b>APM BR-2: Designated Work Zones and Sensitive Resource Avoidance.</b> Prior to ground-disturbing activities, the applicant and SCE will ensure that work zones are clearly staked and flagged. Construction work areas will be identified to ensure that construction activities, equipment, and associated activities are confined to designated work zones and areas supporting sensitive resources (special-status plants and wildlife, and high-value habitats, such as wetlands) are avoided.	<ul style="list-style-type: none"> <li>a. Qualifications of biologist identifying areas supporting sensitive resources</li> <li>b. Maps showing the proposed staked and flagged areas</li> <li>c. CPUC monitor: Line item in monthly report</li> </ul>	<ul style="list-style-type: none"> <li>a. At least one week prior to staking and flagging activities</li> <li>b. At least one week prior to construction activities that would take place near the areas supporting sensitive resources</li> <li>c. Prior to and during construction</li> </ul>	<p>Applicant, SCE, and CPUC</p> <p>* Applicable to all project components</p>
	<b>APM BR-3: Post-Construction Restoration for Reconductoring.</b> SCE will ensure that all areas that are temporarily disturbed during 66-kV subtransmission line reconductoring will be restored as close to preconstruction conditions as possible or to the conditions agreed upon between the landowner and SCE following completion of construction of the proposed project.	<ul style="list-style-type: none"> <li>a. Restoration plan</li> <li>b. Maps and photos of pre-construction conditions along 66-kV subtransmission line route</li> <li>c. Report of restoration activities</li> <li>d. CPUC monitor: Line item in monthly report</li> </ul>	<ul style="list-style-type: none"> <li>a. At least 3 months prior to construction</li> <li>b. 30 days prior to construction</li> <li>c. Within one month after completion of restoration activities</li> <li>d. After construction</li> </ul>	<p>Applicant, SCE, and CPUC</p> <p>* Applicable to 66-kV subtransmission line project component</p>
	<b>APM BR-4: Preconstruction Gnatcatcher Surveys.</b> The applicant	a. Biologist qualifications	a. At least one week	Applicant, SCE, CPUC,

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	and SCE will ensure that protocol-level pre-construction surveys will be conducted for coastal California gnatcatcher, in project component areas where suitable habitat exists in accordance with the U.S. Fish and Wildlife Service Coastal California Gnatcatcher ( <i>Poliophtila californica californica</i> ) Presence/Absence Survey Guidelines, February 28, 1997. In the event that coastal California gnatcatcher are observed in pre-construction surveys, a buffer of 500 feet from any active nest will be flagged and maintained by a biological monitor. If infeasible to maintain a buffer of 500 feet from an active gnatcatcher nest work within or near these areas will be performed outside of the breeding and nesting season. Areas of 2 or more contiguous acres of suitable coastal California gnatcatcher habitat will be identified at the time of pre-construction surveys, and work within or near these areas will be performed outside of the breeding and nesting season (coastal California gnatcatcher breeding/nesting season is approximately February 15 through August 30).	<ul style="list-style-type: none"> <li>b. Notification of planned surveys</li> <li>c. Survey report, including maps of areas of 2 or more contiguous acres of suitable coastal California gnatcatcher habitat</li> <li>d. Maps showing the proposed flagging or fencing areas</li> <li>e. Brief report of monitoring activities</li> <li>f. CPUC monitor: Line item in monthly report</li> </ul>	<ul style="list-style-type: none"> <li>prior to conducting surveys</li> <li>b. At least one week prior to surveys and per survey windows timing</li> <li>c. Within three weeks after surveys are completed and at least two weeks prior to construction</li> <li>d. At least 3 days prior to construction activities that would take place near the fenced area and/or as stipulated in Nesting Bird Management Plans (see MM BR-8)</li> <li>e. As stipulated in Nesting Bird Management Plans (see MM BR-8) or by CPUC monitor</li> </ul>	<p>CDFW, USFWS</p> <p>* Applicable to all project components (in areas of suitable habitat)</p>
			f. Prior to and	

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
			during construction	
	<b>APM BR-5: Exclusionary Fencing.</b> The applicant and SCE will ensure that exclusionary fencing will be installed around work and laydown/staging areas, where necessary, to prevent inadvertent encroachment into the native habitat adjacent to areas of impact. Brightly colored, protective construction fencing and/or silt fencing will be erected surrounding the work area where it abuts native habitat prior to the start of construction and/or demolition.	<ul style="list-style-type: none"> <li>a. Qualifications of biologist identifying areas of native habitat</li> <li>b. Maps showing the proposed fenced areas</li> <li>c. CPUC monitor: Line item in monthly report</li> </ul>	<ul style="list-style-type: none"> <li>a. At least one week prior to staking and flagging activities</li> <li>b. At least 3 days prior to construction activities that would take place near the areas supporting sensitive resources</li> <li>c. Prior to and during construction</li> </ul>	<p>Applicant, SCE, and CPUC</p> <p>* Applicable to all project components</p>
	<b>APM BR-6: Biological Monitoring.</b> The applicant and SCE will ensure that biological monitoring will be conducted during construction in all areas within 100 feet of native vegetation that has the potential, or is known, to provide habitat for special status species.	<ul style="list-style-type: none"> <li>a. Biologist qualifications</li> <li>b. Maps of surveys of native vegetation in the project area (see APM BR-1a)</li> <li>c. Brief report of monitoring activities</li> <li>d. CPUC monitor: Line item in monthly report</li> </ul>	<ul style="list-style-type: none"> <li>a. At least one week prior to construction</li> <li>b. No more than 6 months prior to construction</li> <li>c. Monthly or as needed (as determined by CPUC biological monitor)</li> <li>d. During construction</li> </ul>	<p>Applicant, SCE, and CPUC</p> <p>* Applicable to all project components (all areas within 100 feet of native vegetation that provides or may provide habitat)</p>
	<b>APM GE-2: Erosion and Sediment Control.</b> See below.			

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<b>APM HZ-6: Worker Environmental Awareness Training.</b> See below.			
	<b>MM BR-1: Trimming of Vegetation.</b> In order to minimize the removal of vegetation in areas of habitat for the coastal California gnatcatcher, for the 66-kV subtransmission line, Telecommunications Route #2, and proposed Natural Substation project areas, SCE will ensure that trimming of all native vegetation, riparian vegetation, and vegetation that provides potential habitat for coastal California gnatcatcher will be monitored by a qualified biologist. Trimming of native trees and native arborescent shrubs will be monitored by a qualified arborist.	<ul style="list-style-type: none"> <li>a. Biologist qualifications</li> <li>b. Maps of surveys of vegetation communities in these project component areas (see APM BR-1a)</li> <li>c. Brief report of monitoring activities</li> <li>d. CPUC monitor: Line item in monthly report</li> </ul>	<ul style="list-style-type: none"> <li>a. At least one week prior to construction</li> <li>b. No more than 6 months prior to construction</li> <li>c. Monthly or as needed</li> <li>d. Prior to and during construction</li> </ul>	<p>SCE and CPUC</p> <p>* Applicable to 66-kV subtransmission line, Telecommunications Route #2, Natural Substation project components</p>

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<p><b>MM BR-2: Minimize Removal of Venturan Coastal Sage Scrub.</b> For the 66-kV subtransmission line, Telecommunications Route #2, and proposed Natural Substation project areas, SCE will minimize the removal of Venturan Coastal Sage Scrub associations, particularly within designated critical habitat for the coastal California gnatcatcher. Prior to construction and for each of these project areas, SCE will:</p> <ol style="list-style-type: none"> <li>1. Ensure that a survey of vegetation and estimate of the total area of intact Venturan Coastal Sage Scrub is completed by a qualified botanist familiar with this vegetation association.</li> <li>2. Avoid removal of more than 10 percent of intact Venturan Coastal Sage Scrub within a single project area. "Project Areas" are defined as: <ol style="list-style-type: none"> <li>a. Storage field project components (including the proposed Natural Substation): areas of ground disturbance during construction;</li> <li>b. Access and other roads that would be constructed/modified: 300 linear feet, with a 100-foot buffer on either side of the road; and</li> <li>c. 66-kV line and Telecommunications Route #2: for each pole, a 100-foot radius around the base, plus 100 feet along each extent of the linear ROW beyond the 100-foot radius area.</li> </ol> </li> <li>3. Ensure that areas of intact, contiguous Venturan Coastal Sage Scrub shall not be reduced below a 2-acre threshold.</li> </ol> <p>In the event that SCE wishes to remove more than 10 percent of intact Venturan Coastal Sage Scrub within a single project area, or where intact, contiguous areas of Venturan Coastal Sage Scrub may be reduced below a 2-acre threshold, SCE will compensate for this loss through the restoration and/or creation of Venturan Coastal Sage Scrub habitat per SCE's Habitat Restoration Plan for Venturan Coastal Sage Scrub, at a minimum ratio of 2:1 (for example, 2 acres of Venturan Coastal Sage Scrub created or restored for every 1 acre impacted).</p>	<ol style="list-style-type: none"> <li>a. Botanist qualifications</li> <li>b. Maps of surveys of Venturan coastal sage scrub in these project component areas (see APM BR-1a), submitted as graphics and as GIS data. Maps will include: <ul style="list-style-type: none"> <li>- Identification of discrete areas of Venturan coastal sage scrub larger than 2 acres</li> <li>- Layer showing designated critical habitat for the coastal California gnatcatcher</li> <li>- Layer showing the "project areas" as noted for each of these components</li> <li>- Estimates of the area of Venturan coastal sage scrub that will be removed during project construction</li> </ul> </li> <li>c. Reporting of areas of Venturan coastal sage scrub removed</li> <li>d. CPUC monitor: Line item in monthly report</li> </ol>	<ol style="list-style-type: none"> <li>a. At least one week prior to surveys</li> <li>b. No more than 6 months prior to construction</li> <li>c. Monthly or as needed (as areas of Venturan coastal sage scrub are removed)</li> <li>d. Prior to and during construction</li> </ol>	<p>SCE CPUC</p> <p>* Applicable to 66-kV subtransmission line, Telecommunications Route #2, Natural Substation project components</p>

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<p><b>MM BR-3: Habitat Restoration Plan for Venturan Coastal Sage Scrub.</b> Prior to construction of the proposed project, and with the coordination and review of USFWS and CDFW, the applicant and SCE will prepare a habitat restoration plan for Venturan Coastal Sage Scrub associations for the 66-kV subtransmission line, Telecommunications Route #2, and proposed Natural Substation project areas. The restoration plan will be prepared by a qualified botanist familiar with this vegetation association. Per the requirements of MM BR-2, Venturan Coastal Sage Scrub habitat occurring in these work areas will be identified and quantified; surveys (including vegetation maps) and quantification of Venturan Coastal Sage Scrub habitat will be included in the restoration plan. Restoration will occur at a minimum ratio of 0.5:1 (0.5 acres of Venturan Coastal Sage Scrub created or restored for every 1 acre impacted during project construction), and may be completed by:</p> <ol style="list-style-type: none"> <li>1. Establishing Venturan Coastal Sage Scrub habitat within the project areas (onsite);</li> <li>2. Establishing Venturan Coastal Sage Scrub habitat outside the project areas (offsite); or</li> <li>3. Purchase of credits and/or mitigation lands at a ratio above 0.5:1 from an entity reviewed and approved by the USFWS and/or CDFW.</li> </ol> <p>Details of the restoration plan will be finalized pending consultation between the applicant, SCE, USFWS, and CDFW. For Options 1 and 2 (establishing Venturan Coastal Sage Scrub onsite or offsite), the plan will include the following elements: planting/seeding palettes; monitoring and contingency program; monitoring schedule, including duration and performance criteria (a minimum of 80 percent successful plant establishment after a minimum of three years); and any specific measures that will be required to ensure success of the restoration effort.</p>	<ol style="list-style-type: none"> <li>a. Botanist qualifications</li> <li>b. Venturan coastal sage scrub restoration plan including surveys for the referenced project component areas (see MM BR-2)</li> <li>c. Documentation of coordination with USFWS and CDFW</li> <li>d. CPUC monitor: Line item in monthly report</li> </ol>	<ol style="list-style-type: none"> <li>a. Prior to submittal of the Venturan coastal sage scrub restoration plan</li> <li>b. At least 3 months prior to construction</li> <li>c. At least one month prior to construction</li> <li>d. Prior to, during, and after construction</li> </ol>	<p>SCE, CPUC, CDFW, USFWS</p> <p>* Applicable to 66-kV subtransmission line, Telecommunications Route #2, Natural Substation project components</p>
	<p><b>MM BR-4: Restriction of Vehicular Traffic.</b> The applicant and</p>	<ol style="list-style-type: none"> <li>a. Map showing location of</li> </ol>	<ol style="list-style-type: none"> <li>a. Prior to</li> </ol>	<p>Applicant, SCE, CPUC</p>



Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	SCE will ensure that, in all project construction areas, vehicular traffic (including movement of all equipment) is restricted to established access roads indicated by flagging and signage. All access roads that are not otherwise assigned official speed limits will be restricted to a speed limit of a maximum of 20 miles per hour.	signs posted (see APM AQ-5) b. CPUC monitor: Line item in monthly report	construction b. During construction	* Applicable to all project components
	<b>Special Status Amphibians and Reptiles</b>			
	APM AQ-3: Minimization of Disturbed Areas. See above.			
	APMs BR-2, BR-5, and BR-6. See above.			
	APM GE-2: Erosion and Sediment Control. See above.			
	APM HZ-6: Worker Environmental Awareness Training. See below.			
	<b>MM BR-5: Impacts on Hydrologic Features.</b> Prior to project construction, for all proposed project components in the vicinity of hydrologic features, the applicant and SCE will: <ol style="list-style-type: none"> <li>1. Complete formal delineations per USACE protocols to confirm and determine the extent of jurisdictional wetlands present in the proposed project areas;</li> <li>2. Consult with the USACE and CDFW to determine whether CWA Section 404 permits and California Department of Fish and Game Code Section 1600 Streambed Alteration Agreements are necessary for the proposed project, apply for these permits as needed, and determine the area of fill that would require compensation;</li> <li>3. Commit to compensatory mitigation for any wetland fill per any required permits and in consultation with USACE and CDFW (wetland fill requiring mitigation will be compensated for at a minimum ratio of 0.5:1, or 0.5 acres of wetland creation or restoration for every 1 acre of wetland fill caused by the proposed project); and</li> </ol>	<ol style="list-style-type: none"> <li>a. Formal delineation per USACE protocol of wetlands within the areas of all project components in the vicinity of hydrologic features</li> <li>b. Consultation with USACE and CDFW</li> <li>c. Section 404 permit (USACE) if required per consultation</li> <li>d. Section 1600 Streambed Alteration Agreement or letter of no effect (CDFW)</li> <li>e. Maps showing delineated extent of jurisdictional wetland features plus a 50-foot buffer</li> </ol>	<ol style="list-style-type: none"> <li>a. At least 3 months prior to construction</li> <li>b. Completion prior to construction</li> <li>c. Obtain permit prior to construction</li> <li>d. Obtain permit or letter prior to construction</li> <li>e. Prior to construction activities that would take place within the project component area shown on the map</li> </ol>	Applicant, SCE, CPUC, USACE, CDFW  * Applicable to all project components
	4. Ensure that biological monitors establish and maintain a minimum exclusionary buffer of 50 feet from the delineated	f. Documentation of implementation of	f. Within 30 days after the	

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<p>extent of all jurisdictional wetland features during project construction.</p> <p>Construction of any proposed project component that requires altering, removing, or filling the bed or bank of seasonal drainages, or other jurisdictional or potentially jurisdictional water features, and/or cannot maintain the 50-foot exclusionary buffer, will be performed only when water is not present in the feature.</p>	<p>compensatory mitigation (per Section 404 permit)</p> <p>g. CPUC monitor: Line item in monthly report</p>	<p>completion of construction (and/or per the requirements of the Section 404 permit)</p> <p>g. Prior to and during construction</p>	
	<b>Special Status Birds</b>			
	APM AQ-3: Minimization of Disturbed Areas. See above.			
	APM BR-1a through BR-6. See above.			
	APM BR-7: <b>Wildlife Relocation and Protection.</b> During construction activities, wildlife resources that are not considered to have special status and are determined to be in harm's way may be relocated by the applicant and SCE and/or their construction contractors to native habitat near the work area but outside the construction impact zone in order to avoid injury or mortality.	CPUC monitor: Line item in monthly report	During construction	Applicant, SCE, and CPUC  * Applicable to all project components
	APM GE-2: <b>Erosion and Sediment Control.</b> See above.			
	APM HZ-6: <b>Worker Environmental Awareness Training.</b> See below.			
	APM HZ-7: <b>Wood Pole Recycling and Disposal.</b> See above.			
	MM BR-1 through MM BR-5. See above.			

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<b>MM BR- 6: Avian Safe Building Standards.</b> The applicant and SCE will design all transmission structures installed as part of the proposed project to be consistent with the Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 2006 (APLIC 2006).	a. Proposed measures for compliance with APLIC b. CPUC monitor: Line item in monthly report	a. At least 30 days prior to construction b. Prior to and during construction	Applicant, SCE, and CPUC  * Applicable to 66-kV subtransmission line; Telecommunications Routes #1, #2, #3, #4; Plant Power Line; and Natural Substation project components
	<b>MM BR-7: Avian Protection Plans.</b> At least three months prior to construction, the applicant and SCE will develop and implement avian protection plans according to Avian Protection Plan (APP) Guidelines (APLIC & USFWS 2005). The avian protection plans will include provisions to reduce impacts on avian species during construction and operation of the proposed project, and will provide for the adaptive management of project-related issues. The Avian Protection Plans will be reviewed and approved by the CDFW and USFWS prior to construction.	a. Avian protection plans b. CPUC monitor: Line item in monthly report	a. At least 3 months prior to construction b. Prior to and during construction	Applicant, SCE, CPUC, USFWS, CDFW  * Applicable to all project components
	<b>MM BR-8: Nesting Bird Management Plans.</b> In order to address potential conflicts between construction activities and the activities of nesting birds in the project component areas, the applicant and SCE will develop and implement Nesting Bird Management Plans in consultation with USFWS, CDFW, and CPUC staff and will submit them to CPUC staff at least three months prior to construction. The Nesting Bird Management Plans will include measures and an adaptive management program to avoid and minimize impacts to special-status and MBTA-protected bird species during nesting periods during project construction. The Nesting Bird Management Plans will include: <ul style="list-style-type: none"><li>Guidelines for determining appropriate and effective buffer distances that will account for specific project settings, bird species, stage of nesting cycle, and construction work type;</li></ul>	a. Nesting Bird Management Plans b. CPUC monitor: Line item in monthly report	a. At least 3 months prior to construction b. Prior to and during construction	Applicant, SCE, CPUC, USFWS, CDFW  * Applicable to all project components

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<ul style="list-style-type: none"> <li>Language specifying that the determination of appropriate and effective buffers between construction activities and identified nests will be site- and species-/guild-specific and data-driven, and not based on generalized assumptions regarding all nesting birds;</li> <li>Language specifying that determinations regarding appropriate and effective buffers between construction activities and identified nests can be made in the project construction area by the CPUC staff-approved biological monitor, if that monitor is appropriately qualified per standards that will be included in the Nesting Bird Management Plans. These standards will include requirements for years of experience conducting biological surveys, years of experience with specific bird species identified within the project area, and educational degree and experience.</li> </ul>			
	<p><b>MM BR-9: Pre-Construction Surveys for Least Bell's Vireo.</b> Prior to construction, the applicant and SCE will complete protocol-level surveys for least Bell's vireo in areas of suitable or potentially suitable habitat in the proposed project component areas. Surveys will be completed by a permitted biologist(s) according to the survey protocol for least Bell's vireo (USFWS 2001). Whenever least Bell's vireo territory or nest sites are confirmed, the applicant and/or SCE will notify the USFWS and CDFW immediately upon return from the field. In the event that any least Bell's vireos or their nests are observed, biologists will establish and maintain a minimum 500-foot exclusionary buffer by installing temporary flagging or fencing between the nest site and construction activities. Federal endangered species recovery permits are not required for least Bell's vireo surveys. State survey permits also may be required from the CDFW.</p>	<ul style="list-style-type: none"> <li>a. Biologist qualifications</li> <li>b. Notification of planned surveys</li> <li>c. Survey report</li> <li>d. Maps showing the proposed flagging or fencing areas</li> <li>e. Brief report of monitoring activities</li> <li>f. CPUC monitor: Line item in monthly report</li> </ul>	<ul style="list-style-type: none"> <li>a. At least one week prior to conducting surveys</li> <li>b. At least one week prior to surveys and per survey windows timing</li> <li>c. Within three weeks after surveys are completed and at least two weeks prior to construction</li> </ul>	<p>Applicant, SCE, CPUC, CDFW, USFWS</p> <p>* Applicable to all project components (all areas of suitable/potentially suitable habitat)</p>

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
			<ul style="list-style-type: none"> <li>d. At least 3 days prior to construction activities that would take place near the fenced area and/or as stipulated in Nesting Bird Management Plans (see MM BR-8)</li> <li>e. As stipulated in Nesting Bird Management Plans (see MM BR-8) or by CPUC monitor</li> <li>f. Prior to and during construction</li> </ul>	
	<p><b>MM BR-10: Nesting Golden Eagle.</b> Nesting surveys for golden eagles will be completed per the most recent USFWS survey guidelines by the applicant and SCE prior to project construction and will include areas within 660 feet of proposed project components located within suitable golden eagle nesting habitat. If surveys identify nesting golden eagles within 660 feet of the proposed project component areas, the applicant and SCE will ensure that all construction activities within 660 feet of the nest occur outside of the nesting season (January through June, subject to adjustment based on field observations). The nest will be monitored from outside the 660-foot buffer by a qualified raptor ecologist with demonstrated experience monitoring eagles and</p>	<ul style="list-style-type: none"> <li>a. Biologist qualifications</li> <li>b. Notification of planned surveys</li> <li>c. Survey report</li> <li>d. Maps showing the proposed flagging or fencing areas</li> <li>e. Brief report of monitoring activities</li> </ul>	<ul style="list-style-type: none"> <li>a. At least one week prior to conducting surveys</li> <li>b. At least one week prior to surveys and per survey windows timing</li> </ul>	<p>Applicant, SCE, CPUC, CDFW, USFWS</p> <p>* Applicable to all project components (all areas of suitable habitat within 660 feet of project components)</p>

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	knowledge of normal eagle nesting behavior. In the event that the raptor ecologist observes abnormal behavior or notes any sign of potential disturbance to the nesting birds, the ecologist will ensure that work will be stopped within 1,320 feet of the nest. Work can continue within the buffered area(s) after the raptor ecologist determines that the chicks have fledged and the nest is not active for the season. In the event that golden eagle nests are identified on structures to be removed or modified, the structures will be left in place pending consultation with the USFWS and CDFW.	f. CPUC monitor: Line item in monthly report	<p>c. Within three weeks after surveys are completed and at least two weeks prior to construction</p> <p>d. At least 3 days prior to construction activities that would take place near the fenced area and/or as stipulated in Nesting Bird Management Plans (see MM BR-8)</p> <p>e. As stipulated in Nesting Bird Management Plans (see MM BR-8) or by CPUC monitor</p> <p>f. Prior to and during construction</p>	
	<i>Special Status Mammals</i>			
	APM AQ-3: Minimization of Disturbed Areas. See above.			

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	APM BR-2 through APM BR-6. See above.			
	<p><b>MM BR-15: Restoration of Native Oak Trees:</b> Consistent with City of Santa Clarita, Los Angeles County, and Ventura County policies and guidance addressing trees of the oak genus, the applicant and SCE will take measures to avoid and minimize impacts to oak trees resulting from project construction activities, and will plant replacement trees in compensation for any trees damaged or removed. The applicant and SCE will prepare oak tree survey and replacement plans prior to construction, and, after the completion of final engineering design of the project elements, the applicant and SCE will complete pre-construction surveys, and submit survey results to CPUC staff, to identify all individual trees of the oak genus indigenous to California located in the proposed project component areas. Oak trees will be identified by a qualified arborist, who will record a brief description of each tree (height, width, approximate age, condition, and species). All construction activities that take place within the driplines of oak trees (i.e., the outermost extent of the canopy) that have the potential to damage or result in the removal of oak trees (e.g., more than 25 percent trimming of any individual oak tree canopy during one growing season, excavation or paving near oak trees, oak tree removal) will be monitored by a qualified arborist. Trimming, damage to, or loss of oak trees within the project construction areas shall not occur until the trees are evaluated by a qualified arborist, who shall identify appropriate measures to minimize tree loss which may include the placement of fencing around the dripline, padding construction vehicles, or the placement of protective covering (matting) under the existing dripline during construction activities. If construction activities would lead to damage or the removal of any oak tree with a trunk of 8 inches or more in diameter at 4.5 feet ("breast height"), the tree will be replaced at a 5:1 ratio. Replacement tree planting will be monitored by a qualified arborist, who will ensure the implementation of the following:</p>	<ul style="list-style-type: none"> <li>a. Arborist qualifications</li> <li>b. Oak tree survey and replacement plan, including surveys for oaks in the project component areas as necessary and proposed measures for tree replacement planting</li> <li>c. Final report of oak tree replanting</li> <li>d. CPUC monitor: Line item in monthly report</li> </ul>	<ul style="list-style-type: none"> <li>a. Prior to submittal of the oak tree survey and replacement plan</li> <li>b. At least 3 months prior to construction</li> <li>c. After arborist has determined that replacement trees at a 5:1 ratio have been established and will survive without monitoring or watering</li> <li>d. Prior to, during, and after construction</li> </ul>	<p>Applicant, SCE, CPUC</p> <p>* Applicable to all project components</p>
	1. Replacement trees will be initially planted in 15 gallon			

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<p>containers, and then permanently planted in areas deemed suitable by the arborist;</p> <p>2. Replacement trees will be monitored for 5 years after initial planting for survivability (pursuant to a monitoring schedule established by the arborist); after the 5-year period, the arborist will evaluate whether the trees are capable of surviving without further maintenance;</p> <p>3. Other measures determined necessary by the arborist to ensure the success of all (100 percent) of tree replacement plantings.</p> <p>Tree removal shall not be permitted until replacement trees have been planted or transplanting sites are approved by CPUC staff.</p>			
	<p><b>MM BIO-11: Cover Steep-walled Trenches or Excavations during Construction.</b> To prevent entrapment of wildlife, the applicant and SCE will ensure that all steep-walled trenches, auger holes, or other excavations will be covered at the end of each day or completely fenced off at night. For open trenches only, these may instead have earthen wildlife escape ramps within the trench maintained at intervals of no greater than 100 feet. These earthen ramps shall have a maximum slope not to exceed 2:1. The applicant's and SCE's biological monitor/s will inspect all trenches, auger holes, or other excavations a minimum of twice per day during non-summer months and a minimum of three times per day during the summer (hotter) months, and also immediately prior to back-filling. All non-special status wildlife species found will be safely removed and relocated out of harm's way, through the use of suitable tools such as a pool net when applicable. For safety reasons, biological monitors will under no circumstance enter open excavations.</p>	<p>a. Documentation by applicant or SCE monitor twice daily of appropriate trenching protections</p> <p>b. CPUC monitor: Line item in monthly report</p>	<p>a. During construction (ongoing trenching activities)</p> <p>b. During construction</p>	<p>Applicant, SCE, and CPUC</p> <p>* Applicable to all project components</p>



Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	APM GE-2: Erosion and Sediment Control. See below.			
	APM HZ-6: Worker Environmental Awareness Training. See below.			
	<i>Special Status Plants</i>			
	APM AQ-3: Minimization of Disturbed Areas. See above.			
	APM AQ-4: Watering Prior to Grading and Excavation. See above.			
	APM HZ-6: Worker Environmental Awareness Training. See below.			
	MM BR-4: Restriction of Vehicular Traffic. See above.			
	<p><b>MM BR-12: Restoration of Plummer's Mariposa Lily and Slender Mariposa Lily.</b> The applicant and SCE will complete pre-construction surveys during the appropriate blooming period to identify Plummer's mariposa lily and slender mariposa lily populations in the proposed project component areas at the storage field and in the area of the 66-kV subtransmission line. Plummer's mariposa lily and slender mariposa lily plants will be identified by a qualified biologist and flagged or surrounded with fencing in such a way that disturbance of the populations will be avoided. In the event that populations or individuals of either species cannot be avoided, the applicant and SCE will develop and implement restoration plans for both plants which will be reviewed and approved by CDFW prior to project construction. Restoration will occur after construction and to an extent such that "no net loss" (i.e., replacement of destroyed plants at a 1:1 ratio) is ensured for all plants of either species in the proposed project component areas. Restoration may be completed by:</p> <ol style="list-style-type: none"> <li>1. Establishing Plummer's mariposa lily and slender mariposa lily plants within the proposed project areas (onsite);</li> <li>2. Establishing Plummer's mariposa lily and slender mariposa lily plants outside the project areas (offsite); or</li> <li>3. Purchase of credits and/or mitigation lands at a ratio above 1:1 from an entity reviewed and approved by CDFW.</li> </ol>	<ol style="list-style-type: none"> <li>a. Biologist qualifications</li> <li>b. Notification of planned surveys</li> <li>c. Survey report</li> <li>d. Restoration plan</li> <li>e. Documentation of consultation with CDFW</li> <li>f. Final report of plant restoration</li> <li>g. CPUC monitor: Line item in monthly report</li> </ol>	<ol style="list-style-type: none"> <li>a. At least one week prior to surveys and prior to submittal of the restoration plan</li> <li>b. At least one week prior to surveys and per survey windows timing</li> <li>c. Within three weeks after surveys are completed and at least two weeks prior to construction</li> <li>d. At least one month prior to construction</li> <li>e. At least one month prior to construction</li> </ol>	<p>Applicant, SCE, CPUC, CDFW</p> <p>* Applicable to storage field and 66-kV subtransmission line project components</p>
	Details of the restoration plan will be pending consultation between		f. After biologist has	

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	the applicant and CDFW and/or SCE and CDFW. For Options 1. and 2. (establishing Plummer's mariposa lily and slender mariposa lily plants onsite or off-site), the plan will include the following elements: planting/seeding palettes; monitoring and contingency program; monitoring schedule, including duration and performance criteria (a minimum of 80 percent successful plant establishment after a minimum of three years); and any specific measures that will be required to ensure success of the restoration effort.		determined that replacement plants at a 1:1 ratio have been established and will survive without monitoring or watering  g. Prior to, during, and after construction	
	<p><b>MM BR-13: Non-Native and Invasive Plant Species.</b> The applicant and SCE will avoid and reduce the spread of non-native and invasive plant species in the proposed project component areas through the following actions:</p> <ol style="list-style-type: none"> <li>1. All equipment brought in from offsite that could transport soils, seeds, or other plant propagules (i.e., seeds, spores, tubers, or stems that can reproduce the plant) will be washed at a containment area to prevent introduction of unwanted plant material to the proposed project component areas;</li> <li>2. All construction vehicles or equipment operating within the proposed project component areas in areas known to have noxious or invasive weeds will similarly be cleaned of any soils or plant materials before transport or re-deployment elsewhere within the proposed project component areas to prevent transferring weeds;</li> <li>3. All soils, gravel, imported fill, or other construction materials brought from offsite that could inadvertently contain unwanted plant propagules will come from confirmed weed-free sources;</li> </ol>	<ol style="list-style-type: none"> <li>a. Documentation by applicant or SCE monitor weekly of appropriate actions</li> <li>b. Report of completion of monitoring of areas disturbed during project construction</li> <li>c. CPUC monitor: Line item in monthly report</li> </ol>	<ol style="list-style-type: none"> <li>a. During construction (weekly)</li> <li>b. One year after completion of project construction</li> <li>c. During and after construction</li> </ol>	<p>Applicant, SCE, CPUC</p> <p>* Applicable to all project components</p>

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<p>4. All seeds to be used in revegetation and reclamation activities will come from onsite, or from certified weed-free sources; and</p> <p>5. All temporary disturbance areas not subject to existing infestations of invasive plants, including access roads, transmission line corridors, and towers will be monitored on a quarterly basis for one year after project construction is completed for invasive species establishment, and weed control measures will be initiated immediately upon evidence of invasive species introduction.</p>			
<b>Impact BR-2: Substantial adverse effect on riparian habitat or other sensitive natural community.</b>	<b>Riparian Habitat</b>			
	APM AQ-3: Minimization of Disturbed Areas. See above.			
	APM BR-2: Designated Work Zones and Sensitive Resource Avoidance. See above.			
	APM BR-3: Post-construction Restoration for Reconductoring. See above.			
	APM BR-5: Exclusionary Fencing. See above.			
	APM GE-2: Erosion and Sediment Control. See below.			
	APM HZ-6: Worker Environmental Awareness Training. See below.			
	MM BR-1: Trimming of Vegetation. See above.			
	MM BR-5: Impacts on Hydrologic Features. See above.			
	<p><b>MM BR-14: Minimize Impact on Riparian Habitat.</b> The applicant and SCE will complete the following:</p> <ol style="list-style-type: none"> <li>1. A qualified ecologist will survey and determine the spatial extent of riparian zones within the area of project disturbance in the areas of the storage field, the 66-kV subtransmission line, and Telecommunications Route #2;</li> <li>2. Where riparian vegetation would be impacted by project construction activities, the applicant and SCE will consult with CDFW to determine if a Lake and Streambed Alteration Agreement pursuant to California Fish and Game Code Section 1600 would be necessary; and</li> </ol>	<ol style="list-style-type: none"> <li>a. Ecologist and arborist qualifications</li> <li>b. Notification of planned surveys</li> <li>c. Consultation with CDFW</li> <li>d. Section 1600 Streambed Alteration Agreement or letter of no effect (CDFW), as needed</li> </ol>	<ol style="list-style-type: none"> <li>a. At least one week prior to conducting surveys</li> <li>b. At least one week prior to surveys and per survey windows timing</li> <li>c. Completion prior to construction</li> </ol>	<p>Applicant, SCE, CPUC, CDFW</p> <p>* Applicable to storage field, 66-kV subtransmission line, and Telecommunications Route #2 project components</p>
	3. In those areas where riparian vegetation is required to be	e. Maps showing spatial	d. Obtain permit or	

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	removed, the applicant and SCE will work with a qualified arborist to determine the minimum amount of vegetation required to be removed in order to accommodate project construction, and the correct trimming procedures to employ.	<p>extent of riparian zones within the area of project disturbance in the areas of the storage field, the 66-kV subtransmission line, and Telecommunications Route #2</p> <p>f. Report of minimization of vegetation removal</p> <p>g. CPUC monitor: Line item in monthly report</p>	<p>letter prior to construction</p> <p>e. Prior to construction within the project component area shown on the map</p> <p>f. Within 30 days after the completion of construction</p> <p>g. Prior to and during construction</p>	
	<i>Sensitive Natural Communities</i>			
	APMs BR-1 through BR-7. See above.			
	APM AQ-3: Minimization of Disturbed Areas. See above.			
	MMs BR-1 through BR-10 and MM BR-12. See above.			
	MM BR-15: Restoration of Native Oak Trees.			
<i>Impact BR-3: Substantial adverse effect on federally protected wetlands.</i>	APM AQ-3: Minimization of Disturbed Areas. See above.			
	APM BR-2: Designated Work Zones and Sensitive Resource Avoidance. See above.			
	APM GE-2: Erosion and Sediment Control. See below.			
	MM BR-5: Impacts on Hydrologic Features. See above.			

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
<i>Impact BR-4: Substantial interference with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impedance of the use of native wildlife nursery sites.</i>	APM BR-2: Designated Work Zones and Sensitive Resource Avoidance. See above.			
<i>Impact BR-5: Conflict with local policy and ordinance protecting oak trees.</i>	APM AQ-3: Minimization of Disturbed Areas. See above.			
	APM AQ-4: Watering Prior to Grading and Excavation. See above.			
	MM BR-15: Restoration of Native Oak Trees. See above.			
4.5 Cultural Resources				
<i>Impact CR-1: Substantial adverse change in the significance of an historical resource.</i>	APM CR-1: Conductor Pull and Tension Sites. SCE will ensure that, where feasible, conductor pull and tension sites are located on existing level areas and existing roads to minimize the need for grading and cleanup.	a. Documentation (map) showing final locations of pull and tension sites b. CPUC monitor: Line item in monthly report	a. At least 3 days prior to construction b. During construction	SCE and CPUC  *Applicable to 66-kV subtransmission line and Telecommunications Routes #1, #2, #3, #4 project components

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<b>MM CR-4: Stop Work for Unanticipated Cultural Resources Discoveries.</b> In the event that previously unidentified cultural resources are uncovered during implementation of the project, the applicant and SCE will ensure that ground-disturbing work is halted or diverted away from the discovery to another location. The CPUC staff-approved archeologist will inspect and review the discovery and determine whether further investigation is required. If the discovery is significant but can be avoided and no further impacts would occur, the resource will be documented appropriately and no further effort will be required. If the resource is significant but cannot be avoided and may be subject to further impact, the CPUC staff-approved archeologist will evaluate the significance of the resource based on eligibility for the California Register of Historical Resources (CRHR) or local registers and implement appropriate measures in accordance with the Archaeological Monitoring and Treatment Plans.	a. Archeologist qualifications b. Notification of CPUC monitor of stop work (email or phone call) c. Record of evaluation of find, determination of significance, appropriate documentation (if significant and avoidable), and plan for treatment and/or data recovery (if significant and unavoidable) d. CPUC monitor: Line item in monthly report	a. At least one week prior to construction b. Immediately upon work stoppage c. Within 3 weeks of find d. During construction	Applicant, SCE, and CPUC  *Applicable to all project components
	<b>MM CR-5: Cultural Resources Reporting.</b> Prior to final inspection after construction of project components has been completed, the applicant's and SCE's qualified archaeologists as specified in the Archaeological Monitoring and Treatment Plans will submit reports to CPUC staff summarizing all monitoring and mitigation activities and confirming that all mitigation measures have been implemented. If a cultural resource that meets the definition of a significant resource is encountered and data recovery is necessary, then a data recovery program will be implemented for the resource that is approved by both the qualified archeologist/s and CPUC staff.	a. Archeologist qualifications b. Record of evaluation of find, determination of significance, appropriate documentation (if significant and avoidable), and plan for treatment and/or data recovery (if significant and unavoidable) (see c. under MM CR-4) c. Final report to CPUC staff documenting monitoring and mitigation activities, including data recovery program (if implemented) d. CPUC monitor: Line item in monthly report	a. At least one week prior to construction b. Within 3 weeks of find c. Within one month after construction d. During and after construction	Applicant, SCE, and CPUC  *Applicable to all project components

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<p><b>APM CR-2: Unidentified Cultural Resources.</b> The applicant and SCE will ensure that, if previously unidentified cultural resources are unearthed during construction activities, construction will be halted in that area and directed away from the discovery until a qualified archaeologist assesses the significance of the resource. If determined to be required by the archeologist, the archaeologist will evaluate the significance of the discovered resources based on eligibility for the California Register of Historical Resources (CRHR) or local registers. Should any cultural resources be identified during construction activities in all project areas (including but not limited to culturally sensitive areas), the applicant and SCE will ensure that qualified archaeologists will monitor cultural resources mitigation and ground-disturbing activities in the area of the find. The size of the area of the find will be determined by the archeologist. The archaeologist will recommend appropriate measures to record, preserve, or recover the resources. Preliminary recommendations of CRHR eligibility made by the archaeologist will be reviewed by CPUC staff.</p>	<p>a. See a. under MM CR-4 b. See b. under MM CR-4 c. See c. under MM CR-4 d. Daily monitoring logs for areas with finds (if cultural resources are identified) e. CPUC monitor: Line item in monthly report</p>	<p>a. See a. under MM CR-4 b. See b. under MM CR-4 c. See c. under MM CR-4 d. Daily during construction (if cultural resources are identified) e. During and after construction</p>	<p>Applicant, SCE, and CPUC</p> <p>*Applicable to all project components</p>
	<p><b>APM HZ-6: Worker Environmental Awareness Training.</b> See below.</p>			
	<p><b>MM CR-1: Archeological Monitoring and Treatment Plans.</b> The applicant and SCE will retain the services of qualified cultural resources consultants who meet or exceed the U.S. Secretary of the Interior qualification standards for archaeologists published in 36 Code of Federal Regulations 61 and have experience working in the jurisdictions traversed by the project, sufficient that they can identify the full range of cultural resources that may be found in the region. The consultants will also have knowledge of the cultural history of the project area and will be approved by CPUC staff. Prior to construction, the applicant and SCE will submit Archeological Monitoring and Treatment Plans for the respective project components, prepared by the approved contractor for review and approval by CPUC staff. The intent of the</p>	<p>a. Archeologist qualifications b. Archeological Monitoring and Treatment Plans</p>	<p>a. At least 30 days prior to construction b. At least 30 days prior to construction</p>	<p>Applicant, SCE, and CPUC</p> <p>*Applicable to all project components</p>

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<p>Plans will be to address cultural resources eligible for the CRHR that cannot be preserved by avoidance and to identify areas where monitoring of earth-disturbing activities is required. Each monitoring plan shall include, at a minimum:</p> <ul style="list-style-type: none"> <li>• A list of personnel to which the plan applies;</li> <li>• Requirements, as necessary, and plans for continued Native American involvement and outreach, including participation of Native American monitors during ground-disturbing activities as determined appropriate;</li> <li>• Brief identification and description of the general range of the resources that may be encountered;</li> <li>• Identification of the elements of a site that would lead to it meeting the definition of a cultural resource requiring protection and mitigation;</li> <li>• Identification and description of resource mitigation that would be undertaken if required, such as flagging resources adjacent to work areas for avoidance;</li> <li>• Description of monitoring procedures that will take place for each project component area as required;</li> <li>• Description of how often monitoring will occur (e.g., full-time, part time, spot checking);</li> <li>• Description of the circumstances that would result in the halting of work;</li> <li>• Description of the procedures for halting work and notification procedures for construction crews;</li> <li>• Testing and evaluation procedures for resources encountered;</li> <li>• Description of procedures for curating any collected materials;</li> <li>• Reporting procedures; and</li> <li>• Contact information for those to be notified or reported to.</li> </ul>			



Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<b>APM CR-4: Cultural Surveys After Final Project Siting.</b> Once final siting for SCE project components is completed, SCE or its contractor will complete additional pedestrian surveys for cultural resources, for all areas of proposed disturbance that are not currently located in a built environment within the 66-kV subtransmission line reconductoring route, access roads, and staging areas; and Telecommunications Route #2, access roads, and staging areas. The information gathered from these surveys will be used to determine project planning and design in order to avoid sensitive resources and identify measures that would minimize impacts on sensitive resources from project-related activities. In addition, the results of these surveys will be used to determine the extent to which environmental specialist construction monitors will be required. The survey will result in a report detailing the research design, methods and results of the survey. This report will be submitted to CPUC staff.	<ul style="list-style-type: none"> <li>a. Archeologist qualifications</li> <li>b. Notification of planned surveys</li> <li>c. Archeological Survey Reports</li> <li>d. CPUC monitor: Line item in monthly report</li> </ul>	<ul style="list-style-type: none"> <li>a. At least 30 days prior to construction</li> <li>b. At least one week prior to surveys and at least 30 days prior to construction</li> <li>c. At least 30 days prior to construction</li> <li>d. During construction (as needed)</li> </ul>	<p>SCE and CPUC</p> <p>*Applicable to 66-kV subtransmission line and Telecommunications Route #2 project components</p>
	<b>MM CR-2: Additional Cultural Resources Surveys.</b> Prior to construction, the applicant and SCE will retain qualified archaeological contractor(s), as specified in the Archaeological Monitoring and Treatment Plans, to conduct intensive-level cultural resources surveys (transects no greater than 15 meters) for all areas to be disturbed that have not already been surveyed for cultural resources and, prior to the project, had previously been undisturbed. Reports that specify the research design, methods, and survey results will be submitted to CPUC staff for review. Cultural resources surveys for areas along Telecommunications Route #3 that are located more than 600 feet east of San Fernando Substation and along Telecommunications Route #4 south of Balboa Boulevard and north of Sharp Avenue will not be required, because these areas are located within developed residential neighborhoods that are previously disturbed.	<ul style="list-style-type: none"> <li>a. See a. under APM CR-4</li> <li>b. See b. under APM CR-4</li> <li>c. See c. under APM CR-4</li> <li>d. See d. under APM CR-4</li> </ul>	<ul style="list-style-type: none"> <li>a. See a. under APM CR-4</li> <li>b. See b. under APM CR-4</li> <li>c. See c. under APM CR-4</li> <li>d. See d. under APM CR-4</li> </ul>	<p>SCE and CPUC</p> <p>*Applicable to 66-kV subtransmission line and Telecommunications Route #2 project components</p>

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<b>MM CR-3: Construction Monitoring.</b> Prior to issuance of grading permit(s), the applicant and SCE will retain qualified archaeologists as specified in the Archeological Monitoring and Treatment Plans to monitor cultural resources mitigation and ground-disturbing activities in culturally sensitive areas. Culturally sensitive areas would include those areas along the 66-kV subtransmission line reconductoring routes and Telecommunications Route #3 and #4 and within the storage field that have not previously been disturbed. Cultural resources monitoring for areas along Telecommunications Route #3 that are located more than 600 feet east of San Fernando Substation and areas along Telecommunications Route #4 south of Balboa Boulevard and north of Sharp Avenue will not be required because these areas are located within developed residential neighborhoods that are previously disturbed. The qualified archaeologists will attend preconstruction meetings to provide comments and/or suggestions concerning monitoring plans and discuss excavation plans with excavation contractors.	a. Archeologist qualifications b. Brief report of monitoring activities, recorded daily c. CPUC monitor: Line item in monthly report	a. At least 30 days prior to construction b. Monthly during construction if no cultural resources finds; daily during construction if cultural resources are identified (per APM CR-2) c. During construction	Applicant, SCE, and CPUC  *Applicable to all project components
<i>Impact CR-2: Substantial adverse change in the significance of an archaeological resource.</i>	See Impact CR-1, above.			
<i>Impact CR-3: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.</i>	<b>MM CR-6: Paleontological Monitoring and Treatment Plans.</b> Prior to construction, the applicant and SCE will retain CPUC staff-approved paleontologists to prepare Paleontological Monitoring and Treatment Plans, and submit to CPUC staff for review and approval. The CPUC staff-approved paleontologists will have knowledge of the local paleontology and be familiar with paleontological procedures and techniques. The Paleontological Monitoring and Treatment Plans will: <ul style="list-style-type: none"> <li>Follow Society of Vertebrate Paleontology guidelines and meet all regulatory requirements;</li> <li>Address the 66-kV subtransmission line reconductoring routes,</li> </ul>	a. Paleontologist qualifications b. Paleontological Monitoring and Treatment Plans	a. At least 30 days prior to construction b. At least 30 days prior to construction	Applicant, SCE, and CPUC  *Applicable to 66-kV subtransmission line, Telecommunications Routes #2, #3, #4, Natural Substation, guardhouse, and entry road widening site project components

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<p>Telecommunications Route #2, Telecommunications Route #3, Telecommunications Route #4, Natural Substation, guardhouse, and entry road widening sites;</p> <ul style="list-style-type: none"> <li>Identify construction impact areas of moderate to high sensitivity for encountering potential paleontological resources and the shallowest depths at which those resources may be encountered;</li> <li>Detail the criteria to be used to determine whether an encountered resource is significant and if it should be avoided or recovered for its data potential;</li> <li>Detail methods of recovery, preparation and analysis of specimens, final curation of specimens at a federally accredited repository, data analysis, and reporting;</li> <li>Outline coordination strategies to ensure that CPUC staff-approved paleontological monitors will conduct full-time monitoring of all grading activities in sediments determined to have a moderate to high sensitivity. For sediments of low or undetermined sensitivity, the Paleontological Monitoring and Treatment Plans will specify what level of monitoring is necessary. Sediments with no sensitivity will not require paleontological monitoring;</li> <li>Define specific conditions in which monitoring of earthwork activities could be reduced and/or depth criteria established to trigger monitoring. These factors will be defined by the CPUC staff-approved paleontologists.</li> </ul>			

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<b>MM CR-7: Paleontology Sensitivity Training.</b> Prior to the initiation of construction or ground-disturbing activities in areas with high paleontological sensitivity, the applicant and SCE shall ensure that all construction personnel conducting rough grading shall be trained regarding the recognition of possible subsurface paleontological resources and protection of all paleontological resources during construction grading. The applicant and SCE will complete training for all applicable personnel. Training will inform all applicable personnel of the procedures to be followed upon the discovery of paleontological resources. All personnel will be instructed that unauthorized collection or disturbance of protected fossils on- or off-site by the applicant or SCE or their representatives or employees is illegal and that violators shall be subject to prosecution under appropriate federal and state laws. Unauthorized resource collection or disturbance may constitute grounds for the issuance of a stop work order.	a. Qualifications of paleontologist to conduct training b. Documentation of training as described in MM CR-7, including documentation of CPUC monitor's attendance at first paleontological resources training session. c. Records of trained personnel and training session logs (maintained and kept on site by construction lead) d. CPUC monitor: Line item in monthly report	a. At least 30 days prior to construction b. Prior to construction c. During construction (updated periodically) d. During construction	Applicant, SCE, and CPUC  * Applicable to all project components
	<b>MM CR-8: Paleontology Construction Monitoring.</b> Based on the Paleontological Monitoring and Treatment Plans, the applicant and SCE will conduct paleontological monitoring using CPUC staff-approved paleontological contractor. This will include monitoring during rough grading and trenching in areas determined to have high paleontological sensitivity and that have the potential to be shallow enough to be adversely affected by such earthwork as determined by the CPUC staff-approved Paleontological Monitoring and Treatment Plans.	a. Paleontologist qualifications b. Brief report of monitoring activities, recorded daily c. CPUC monitor: Line item in monthly report	a. At least 30 days prior to construction b. Monthly during construction if no paleontological resources finds; daily during construction if paleontological resources are identified c. During construction	Applicant, SCE, and CPUC  *Applicable to 66-kV subtransmission line, Telecommunications Routes #2, #3, #4, Natural Substation, guardhouse, and entry road widening site project components
	<b>MM CR-9: Stop Work for Unanticipated Paleontological Discoveries.</b> In the event that previously unidentified	a. Paleontologist	a. At least one week prior to	Applicant, SCE, and

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	paleontological resources are uncovered during implementation of the project, the applicant and SCE will ensure that ground-disturbing work would be halted or diverted away from the discovery to another location. A CPUC staff-approved paleontologist would inspect the discovery and determine whether further investigation is required. If the discovery is significant but can be avoided and no further impacts would occur, the resource would be documented in the appropriate paleontological resource records and no further effort would be required. If the resource is significant but cannot be avoided and may be subject to further impact, the CPUC staff-approved paleontological monitor would evaluate the significance of the resource and implement appropriate measures in accordance with the Paleontological Monitoring and Treatment Plans.	<ul style="list-style-type: none"> <li>qualifications</li> <li>b. Notification of CPUC staff of potential discovery and stop work (email or phone call)</li> <li>c. Record of evaluation of find, determination of significance, appropriate documentation of each discovery in appropriate paleontological resource records (if significant and avoidable), and documentation of measures taken or to be taken by paleontological monitor per the Paleontological Monitoring and Treatment Plans (if significant and unavoidable)</li> <li>d. CPUC monitor: Line item in monthly report</li> </ul>	<ul style="list-style-type: none"> <li>construction</li> <li>b. Immediately upon discovery</li> <li>c. Within 3 weeks of find</li> <li>d. During construction</li> </ul>	<p>CPUC</p> <p>*Applicable to all project components</p>
<b>Impact CR-4:</b> <i>Disturb any human remains, including those interred outside of formal cemeteries.</i>	<b>APM CR-3: Human Remains.</b> The applicant and SCE will ensure that, if human remains are encountered during construction or any other phase of development, work will be halted in the area and directed away from the discovery. The County Coroner will be notified within 24 hours of the discovery. No further disturbance will occur until the County Coroner makes the necessary findings of origin and disposition pursuant to Public Resources Code 5097.98–99, Health and Safety Code 7050.5. If	<ul style="list-style-type: none"> <li>a. Notification of CPUC of potential discovery and stop work (email)</li> <li>b. Documentation of notification of County Coroner within 24 hours of discovery (email)</li> </ul>	<ul style="list-style-type: none"> <li>a. Within one hour of potential discovery</li> <li>b. Immediately upon notification</li> <li>c. Immediately upon receipt of findings of origin and disposition</li> </ul>	<p>Applicant, SCE, and CPUC</p> <p>*Applicable to all project components</p>
	the coroner determines that the burial is not historic, but prehistoric, the Native American Heritage Commission (NAHC) will be	<ul style="list-style-type: none"> <li>c. Documentation of the County Coroner's findings</li> </ul>	<ul style="list-style-type: none"> <li>d. Within 24 hours of County Coroner's</li> </ul>	

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	contacted to determine the most likely descendent (MLD) for this area. The MLD may become involved with the disposition of the burial following scientific analysis. If the remains are determined to be Native American, the Native American Heritage Commission will be notified within 24 hours as required by Public Resources Code 5097. CPUC staff will mediate any disputes regarding treatment of remains.	of origin and disposition (email) d. If County Coroner determines that the burial is not prehistoric, but historic: Documentation of notification of Native American Heritage Commission e. CPUC monitor: Line item in monthly report	determination e. During construction	
	<b>APM CR-4: Cultural Surveys After Final Project Siting.</b> See above.			
	<b>MM CR-1: Cultural Resources Plan.</b> See above.			
	<b>MM CR-2: Additional Cultural Resources Surveys.</b> See above.			
	<b>MM CR-3: Construction Monitoring.</b> See above.			
	<b>MM CR-4: Stop Work for Unanticipated Cultural Resources Discoveries.</b> See above.			
	<b>MM CR-5: Cultural Resources Reporting.</b> See above.			
	<b>MM CR-10: Paleontological Data Recovery.</b> Prior to final inspection after construction of project components has been completed, if avoidance of significant paleontological resources is not feasible during grading, treatment (including recovery, specimen preparation, data analysis, curation, and reporting) will be carried out by the applicant and SCE in accordance with the approved Paleontological Monitoring and Treatment Plans.	a. Documentation of treatment per the Paleontological Monitoring and Treatment Plans	a. Prior to final inspection after construction of project components has been completed	Applicant, SCE, and CPUC  *Applicable to all project components

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
<b>4.6 Geology, Soils, and Mineral Resources</b>				
<b>Impact GE-1:</b> <i>Expose people or structures to risk of loss, injury, or death involving rupture of a known earthquake fault.</i>	<b>APM GE-1: Geotechnical Studies.</b> The applicant will ensure that, for the construction of the Central Compressor Station, construction procedures will be conducted as discussed in the recommendations sections of the Preliminary Geotechnical Investigation Reports prepared by Globus (2006) and Mactec (2011) to avoid impacts related to unstable geologic conditions. In addition, pre-engineering geotechnical studies will be completed by the applicant and SCE for the proposed Natural Substation and select TSP locations prior to construction. The pre-engineering geotechnical studies will evaluate the depth to the water table; document evidence of faulting; and determine liquefaction potential, physical properties of subsurface soil, soil resistivity, slope stability, and the presence of hazardous materials. The applicant and SCE will further ensure that, for the construction of the Natural Substation and select TSP locations, construction procedures will be conducted as discussed in the recommendations section of the geotechnical studies report.	a. Geotechnical studies report for Natural Substation and select TSP locations b. CPUC monitor: Line item in monthly report	a. Prior to construction b. During construction	Applicant, SCE, and CPUC  *Applicable to the Central Compressor Station and Natural Substation project components, and select TSP locations (as identified by the geotechnical studies)
<b>Impact GE-2:</b> <i>Expose people or structures to the risk of loss, injury, or death involving strong seismic ground shaking.</i>	<b>APM GE-1: Geotechnical Studies.</b> See above.			
<b>Impact GE-3:</b> <i>Expose people or structures to the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.</i>	<b>APM GE-1: Geotechnical Studies.</b> See above.			
<b>Impact GE-4:</b>	<b>APM GE-1: Geotechnical Studies.</b> See above.			

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
<i>Expose people or structures to the risk of loss, injury, or death involving landslides.</i>				
<i>Impact GE-5: Result in substantial soil erosion or the loss of topsoil.</i>	APM AQ-3: Minimization of Disturbed Areas. See above.			
	<p><b>APM GE-2: Erosion and Sediment Control.</b> The applicant and SCE will ensure that erosion and sediment control measures will be implemented in each of the project component areas during construction activities to reduce the amount of soil displaced and transported to other areas by storm water, wind, or other natural forces. To minimize site disturbance, the applicant and SCE or their respective construction contractors will:</p> <ul style="list-style-type: none"> <li>Remove only the vegetation that is absolutely necessary to remove (e.g., trim or mow instead of grub where feasible);</li> <li>Avoid off-road vehicle use outside work zones; and</li> <li>Instruct all construction personnel on storm water pollution prevention concepts to ensure they are conscious of how their actions affect the potential for erosion and sedimentation.</li> </ul>	<p>a. Documentation of training of construction personnel on storm water pollution prevention concepts (see APM HZ-6: Worker Environmental Awareness Training Program), maintained and kept on site by construction lead</p> <p>b. Final approved Stormwater Pollution Prevention Plans (SWPPPs), maintained and kept on site by construction lead</p> <p>c. CPUC monitor: Line item in monthly report</p>	<p>a. Prior to and during construction</p> <p>b. Prior to and during construction</p> <p>c. During construction</p>	<p>Applicant, SCE, and CPUC</p> <p>*Applicable to all project components</p>
	MM BR-5: Impacts on Hydrologic Features. See above.			
<i>Impact GE-6: Located on a geologic unit or soil that is or would become</i>	APM GE-1: Geotechnical Studies. See above.			



Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
<i>unstable and result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.</i>				

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
<i>Impact GE-7: Located on expansive soil.</i>	APM GE-1: Geotechnical Studies. See above.			
4.7 Greenhouse Gases				
<i>Impact GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.</i>	APM AQ-1: Maintain Engines in Good Working Condition. See above.			
	APM AQ-2: Minimization of Equipment Use. See above.			
	APM GHG-1: <b>Engine Maintenance.</b> The applicant and SCE will ensure that construction and operations vehicle equipment engines are maintained in good condition and in proper tune according to manufacturer specifications.	CPUC monitor: Line item in monthly report (see APM AQ-1)	During construction	Applicant, SCE, and CPUC  *Applicable to all project components
	APM GHG-2: <b>Scheduling.</b> The applicant and SCE will ensure that staff and daily construction activities for each of the project components are efficiently scheduled to minimize the use of unnecessary/duplicate equipment when possible.	CPUC monitor: Line item in monthly report (see APM AQ-2)	During construction	Applicant, SCE, and CPUC  *Applicable to all project components
4.8 Hazards and Hazardous Materials				
<i>Impact HZ-1: Significant hazard from routine transport, use, or disposal of hazardous</i>	APM HZ-7: <b>Wood Pole Recycling and Disposal.</b> SCE will ensure that utility pole and other utility wood waste is reused by SCE, returned to the manufacturer, disposed of in a Class I hazardous waste landfill, or disposed of in the lined portion of a municipal landfill certified by the associated Regional Water Quality Control Board.	CPUC monitor: Line item in monthly report	During construction	SCE and CPUC  *Applicable to the 66-kV subtransmission line and Telecommunications

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
materials.				Routes #1, #2, #3, and #4 project components
	<p><b>APM HZ-3: Hazardous Materials Spill and Release Prevention.</b> The applicant and SCE will ensure that construction procedures are implemented to minimize the potential for hazardous material spills and releases in each of the project component areas.</p>	<p>a. Construction procedures for minimizing spill potential, including Spill Prevention, Control, and Countermeasure (SPCC) Plans, as maintained and kept on site by the construction lead</p> <p>b. CPUC monitor: Line item in monthly report</p>	<p>a. Prior to and during construction</p> <p>b. Prior to and during construction</p>	<p>Applicant, SCE, and CPUC</p> <p>*Applicable to all project components</p>
	<p><b>APM HZ-5: Hazardous Materials Use and Storage and Hazardous Waste.</b> The applicant and SCE will ensure the following during construction of the proposed project components:</p> <ul style="list-style-type: none"> <li>All hazardous materials (including fuels, lubricants, and cleaning solvents) will be stored, handled, and used in accordance with applicable regulations.</li> <li>For all hazardous materials in use at construction sites, Material Safety Data Sheets will be available for routine or emergency use.</li> </ul> <p>In addition, the applicant will ensure the following for the storage field project components during construction:</p> <ul style="list-style-type: none"> <li>All hazardous materials planned for use or storage at the storage field site during construction of the proposed Central Compressor Station will be preapproved by the applicant's designated safety staff. Approval of hazardous materials will be determined only after full review of the Material Safety Data Sheet for the proposed material.</li> <li>Hazardous materials storage locations at the storage field will be determined based on the storm water pollution prevention plan and storage field policy. Existing materials are stored within</li> </ul>	<p>a. Hazardous Material Safety Data Sheets, maintained and kept on site by the construction lead and project operator; SWPPPs for construction and operation</p> <p>b. CPUC monitor: Line item in monthly report</p>	<p>a. Prior to and during construction, and during operation</p> <p>b. Prior to and during construction</p>	<p>Applicant, SCE, and CPUC</p> <p>*Applicable to all project components</p>

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<p>the storage field's hazardous material and hazardous waste storage area.</p> <p>The applicant and SCE will also ensure the following during operation of the proposed project components:</p> <ul style="list-style-type: none"> <li>• All hazardous and nonhazardous wastes generated during operation of the proposed project (e.g., waste oil and gas condensates from the compressor station) will be classified and managed in accordance with federal and state regulations and site-specific permits.</li> <li>• All hazardous materials (including fuels, lubricants, and cleaning solvents) will be stored, handled, and used in accordance with applicable regulations.</li> </ul>			
	<p><b>APM HZ-6: Worker Environmental Awareness Training.</b> Prior to construction, the applicant and SCE will develop and implement Worker Environmental Awareness Training Programs based on the final engineering design, the results of preconstruction surveys, and a list of mitigation measures developed by CPUC staff to mitigate significant environmental effects of the proposed project. Prior to start of work, presentations will be prepared by the applicant and SCE and shown to all workers who will be present on the proposed project component sites during construction. A record of all trained personnel (including logs of training sessions signed by all workers who attended each session) will be kept with the construction foreman. CPUC staff will conduct regular (monthly and random) audits to ensure that workers on the project component sites have received the appropriate training. Audits will include worker tests and/or interviews to confirm adequate instruction in construction procedures and mitigation measures.</p> <p>All construction personnel will receive the following:</p> <ol style="list-style-type: none"> <li>1. Instruction for compliance with project component site-specific biological or cultural resource protective measures and mitigation measures that are developed after preconstruction surveys;</li> </ol>	<ol style="list-style-type: none"> <li>a. Documentation of Worker Environmental Awareness Training Program (WEATP) course as described in APM HZ-6</li> <li>b. Documentation of attendance of CPUC mitigation monitor for first WEATP training session.</li> <li>c. Record of trained personnel and training session log maintained and kept on site with construction lead</li> <li>d. CPUC monitor: Line item in monthly report</li> </ol>	<ol style="list-style-type: none"> <li>a. Prior to and during construction</li> <li>b. Prior to construction</li> <li>c. Prior to and during construction</li> </ol>	<p>Applicant, SCE, and CPUC</p> <p>*Applicable to all project components</p>

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<ol style="list-style-type: none"> <li>2. A list of phone numbers for key personnel associated with the proposed project including the archaeological and biological monitors, environmental compliance coordinator, and regional spill response coordinator;</li> <li>3. Instruction on the South Coast Air Quality Management District Fugitive Dust and Ozone Precursor Control Measures and Portable Engine Operating Parameters;</li> <li>4. Direction that site vehicles must be properly muffled;</li> <li>5. Instruction on what typical cultural resources look like, and instruction that if cultural resources are discovered during construction, to suspend work in the vicinity of the find and contact the site supervisor and archeologist or environmental compliance coordinator;</li> <li>6. Instruction on how to work near any Environmentally Sensitive Areas delineated by archeologists or biologists;</li> <li>7. Instruction on individual responsibilities under the Clean Water Act, the applicant's and SCE's storm water pollution prevention plans, site-specific best management practices, hazardous materials and waste management requirements, and the location of Material Safety Data Sheets as needed for each proposed project component;</li> <li>8. Instructions to notify the site supervisor and regional spill response coordinator in the event of hazardous materials spills or leaks from equipment or upon the discovery of soil or groundwater contamination;</li> <li>9. A copy of the truck routes to be used for material delivery; and</li> <li>10. 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 components.</li> </ol>			

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
<i>Impact HZ-2: Significant hazard from accident conditions involving the release of hazardous materials.</i>	APM HZ-3: Hazardous Materials Spill and Release Prevention. See above.			
	APM HZ-4: Contaminated Soil Disposal. The applicant and SCE will ensure that any soil from excavation and grading activities that is suspected of being contaminated with oil or other hazardous materials is characterized and disposed offsite at an appropriately licensed waste facility.	CPUC monitor: Line item in monthly report	During construction	Applicant, SCE, and CPUC  * Applicable to all project components
	APM HZ-5: Hazardous Materials Use and Storage and Hazardous Waste. See above.			
	APM HZ-6: Worker Environmental Awareness Training. See above.			
	MM HZ-1: Contaminated Soils Contingency Plan. The applicant will prepare a Contaminated Soils Contingency Plan that would outline procedures for testing soils in locations where contaminated soils are suspected to be present including the office building and Central Compressor Station site locations. The Contaminated Soils Contingency Plan will also outline the steps that would be implemented if contaminated soils are encountered during pre-construction soil sampling and testing or if they are encountered at any point during construction. Provisions outlined in this plan would include phone numbers of city, county, state, and federal agencies and primary, secondary, and final cleanup procedures. In addition, the plan would address health and safety procedures to minimize environmental impacts in the event that hazardous soils or other materials are encountered during construction of the project, including measures such as worker training, containerization and storage, and monitoring. The plan would also establish security measures to prevent unauthorized entry to cleanup sites and to reduce hazards outside the investigation/cleanup area and would identify appropriate, licensed disposal facilities, and haulers.	a. Contaminated Soils Contingency Plan b. Brief report of monitoring activities, if required c. CPUC monitor: Line item in monthly report	a. Prior to construction b. As needed during construction, as part of monthly reporting c. Prior to and during construction	Applicant and CPUC  * Applicable to all storage field project components constructed by the applicant

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
<i>Impact HZ-3: Emit hazardous emissions or involve handling hazardous materials, substances, or waste within one-quarter miles of an existing or proposed school.</i>	APM HZ-3: Hazardous Materials Spill and Release Prevention. See above.			
	APM HZ-5: Hazardous Materials Use and Storage and Hazardous Waste. See above.			
	APM HZ-6: Worker Environmental Awareness Training. See above.			
<i>Impact HZ-4: Be located on a site that is included on a list of hazardous materials sites.</i>	MM HZ-1: Contaminated Soils Contingency Plan. See above.			
<i>Impact HZ-5: Safety hazards for people residing or working in the project component areas that are within the area of an airport land use plan or within two miles of an airport.</i>	APM HZ-1: Federal Aviation Administration Consultation. SCE would file the necessary FAA Form 7460 for structures (poles/towers/conductors) that exceed notification requirements outlined in FAA Part 77. SCE would file the form upon completion of final engineering and prior to construction per FAA Part 77. All FAA recommendations, including the marking of conductor and installation of warning lights on TSPs will be implemented into the design of the project as appropriate.	a. Record of FAA consultation and forms filed (if required by FAA Part 77) b. CPUC monitor: Line item in monthly report	a. Prior to construction b. Prior to and during construction	SCE and CPUC  *Applicable to all SCE project components that exceed notification requirements outlined in FAA Part 77
<i>Impact HZ-6: Impair implementation of or physically interfere with an adopted emergency response plan or</i>	MM HZ-2: Construction Fire Control and Emergency Response Measures. To address the risk of fire during construction of the proposed project components, the applicant and SCE will develop fire control and emergency response measures as part of the Construction Safety and Emergency Response Plans developed in consultation with their contractors for use during construction of the proposed project components. The Construction Fire Control and Emergency Response Measures will describe fire prevention and	a. Construction Safety and Emergency Response Plans and Fire Control and Emergency Response Measures b. CPUC monitor: Line item in monthly report	a. Prior to and during construction b. Prior to and during construction	Applicant, SCE, and CPUC  *Applicable to all project components

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
<i>emergency evacuation plan.</i>	<p>response practices that the applicant and SCE will implement during construction of the proposed project components to minimize the risk of fire, and in the case of fire, provide for immediate suppression and notification. SCE's Construction Fire Control and Emergency Response Measures will also be generally consistent with SCE's Specification E-2005-104, Transmission Line Project Fire Plan (February 21, 2006).</p> <p>The Construction Fire Control and Emergency Response Measures shall specify that the applicant and SCE, or the respective construction contractors, shall furnish all supervision, labor, tools, equipment, and material necessary to prevent starting any fire, control the spread of fires if started, and provide assistance for extinguishing fires started as a result of project construction activities.</p> <p>Labor shall include the assignment of Fire Risk Managers who will be present at each proposed project component area during construction activities, whose sole responsibility will be to monitor the contractor's fire-prevention activities, and who will have full authority to stop construction in order to prevent fire hazards.</p> <p>1. The Fire Risk Managers shall:</p> <ul style="list-style-type: none"> <li>• Be responsible for preventing, detecting, controlling, and extinguishing fires set accidentally as a result of construction activity;</li> <li>• Review the Fire Control and Emergency Response Measures with the fire patrolperson and construction employees prior to starting work at each project area;</li> <li>• Ensure that all construction personnel are trained in fire safety measures relevant to their responsibilities. At a minimum, construction personnel shall be trained and equipped to extinguish small fires;</li> <li>• Be equipped with radio or cell phone communication capability; and</li> </ul>			



Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

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	<ul style="list-style-type: none"> <li>Maintain an updated a key personnel and emergency services contact (telephone and email) list, kept onsite and made available as needed to construction personnel.</li> </ul> <p>2. Equipment shall include:</p> <ol style="list-style-type: none"> <li>Spark arresters that are in good working order and meet applicable regulatory standards for all diesel and gasoline internal combustion engines, stationary and mobile;</li> <li>One shovel and one pressurized chemical fire extinguisher for each gasoline-powered tool, including but not restricted to compressors, hydraulic accumulators, gardening tools (such as chain saws and weed trimmers), soil augers, rock drills, etc.;</li> <li>Fire suppression equipment to be kept on all vehicles used for project construction; and</li> <li>An onboard self-extinguishing fire suppression system capable of extinguishing any equipment-caused fire to be kept on heavy construction operating equipment.</li> </ol> <p>3. Measures to be undertaken by the applicant, SCE or the respective construction contractors, and monitored and enforced by the Fire Risk Manager, at each of the project areas during construction activities, shall include:</p> <ol style="list-style-type: none"> <li>The installation of fire extinguishers at the proposed Central Compressor Station site;</li> <li>The prohibition of smoking at each construction job site as follows: no smoking in wildland areas; no smoking during operation of light or heavy equipment; limit smoking to paved areas or areas cleared of all vegetation; no smoking within 30 feet of any area in which combustible materials (including fuels, gases, and solvents) are stored; no smoking in any project construction areas during any Red Flag Warnings that apply to the area;</li> </ol>			

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<ul style="list-style-type: none"> <li>c. The posting of no smoking signs and fire rules on the project bulletin board at all contractor field offices and areas visible to employees during fire season;</li> <li>d. The maintenance of all construction areas in an orderly, safe, and clean manner. All oily rags and used oil filters shall be removed from project construction areas. After construction activities are completed in each project area, the area shall be cleaned of all trash and surplus materials. All extraneous flammable materials shall be cleared from equipment staging areas and parking areas;</li> <li>e. Confinement of welding activities to cleared areas having a minimum radius of 10 feet measured from place of welding, and observed by the Fire Risk Manager;</li> <li>f. Prevention of the idling of vehicles with hot exhaust manifolds on dirt roads with dead combustible vegetation under the vehicle;</li> <li>g. The provision of portable communication devices (i.e., radio or mobile telephones) as needed to construction personnel and communication protocols for onsite workers to coordinate with local agencies and emergency personnel in the event of fire or other emergencies during construction or operation of the proposed project; and</li> <li>h. Any additional measures as needed during construction to address fire prevention and detection, to lower the risk of wildland fires.</li> </ul> <p>4. Measures will also include the following requirements that would involve coordination between the applicant and SCE, and the Fire Departments and CAL FIRE:</p> <ul style="list-style-type: none"> <li>a. The applicant and SCE or the respective construction contractors shall furnish any and all forces and equipment to extinguish any uncontrolled fire near the project component areas as directed by Fire Department or CAL</li> </ul>			

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<p>FIRE representatives;</p> <p>b. The applicant and SCE or the respective construction contractors shall abide by all restrictions to construction activity that may be enforced by the Fire Departments and/or CAL FIRE during Red Flag Warning days; and</p> <p>c. In the event that SCE or their construction contractor sets fire to incinerate cleared vegetation, the Fire Risk Manager shall notify the Fire Departments and/or CAL FIRE in advance of the burning. Special care shall be taken to prevent damage to adjacent structures, trees, and vegetation. The applicant will not burn cleared vegetation during construction activities.</p> <p>5. Measures will also include additional, special provisions for days when the National Weather Service issues a Red Flag Warning. Standard protocols implemented during these periods will include:</p> <p>a. Measures to address storage and parking areas;</p> <p>b. Measures to address the use of gasoline-powered tools;</p> <p>c. Procedures for road closures as necessary;</p> <p>d. Procedures for use of a fire guard as necessary; and</p> <p>e. Additional fire suppression tools and fire suppression equipment, and training requirements.</p>			
<b>Impact HZ-7:</b> <i>Expose people or structures to a significant risk involving wildland fires.</i>	<b>MM HZ-2: Construction Fire Control and Emergency Response Measures.</b> See above.			
	<b>MM HZ-3: Fire Department Review and Coordination.</b> Prior to construction of the proposed project components, the applicant and SCE will coordinate with the City of Los Angeles Fire Department, and the Los Angeles County and Ventura County Fire Departments (Fire Departments) according to the location of the proposed project components. The applicant and SCE will submit the following materials ("fire management information") for review by the Fire Departments: proposed project components and design, specific construction methods and equipment, and a description of plans	a. Record of coordination with fire departments and written confirmation of review of the fire management information documentation specified in MM HZ-3 submitted to the fire departments	<p>a. Prior to and during construction</p> <p>b. Prior to operations</p> <p>c. Prior to construction and prior to operations</p>	<p>Applicant, SCE, and CPUC</p> <p>*Applicable to all project components</p>

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<p>and measures including but not limited to the applicant's Fire/Emergency Action Plan, SCE's Fire Management Plan, the applicant's and SCE's Construction Safety and Emergency Response Plans, and measures that would be undertaken by the applicant and SCE to further address risks involving wildland fires during construction and operation of the proposed project components (including Fire Control and Emergency Response Measures). The Fire Departments will review the applicant and SCE's fire management information prior to construction and operation (as appropriate) of the proposed project components, in accordance with each respective fire department's codes, regulations, ordinances, guidelines, and other policy which may guide such review, including but not limited to:</p> <ol style="list-style-type: none"> <li>1. The County of Los Angeles Fire Code (2011), including permits as required under Chapter 1, Section 105; Chapter 3, Section 325 (Clearance of Brush and Vegetative Growth); Chapter 4 (including Section 404.3.2, Fire Safety Plans, and 408.7.5, Emergency Plan); and Chapter 14 (fire safety during construction and demolition);</li> <li>2. The County of Los Angeles Building Code (2011), which would apply to buildings within the project area that would require plan review from the County of Los Angeles Fire Department; and</li> <li>3. CAL FIRE's Power Line Fire Prevention Field Guide (2008).</li> </ol> <p>The Fire Departments will submit written confirmation of the completion of this review to the applicant and SCE prior to project construction and operation. The applicant will also submit any revisions of the facility Fire/Emergency Action Plan related to operation of the Central Compressor Station, for the same level of review, prior to the start of project operations at the storage field.</p>	<ol style="list-style-type: none"> <li>b. Record of fire department review of Storage Field Fire/Emergency Action Plan revisions for Central Compressor Station operation</li> <li>c. CPUC monitor: Line item in monthly report</li> </ol>		
4.9 Hydrology and Water Quality				

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
<i>Impact HY-1: Violate water quality standards or waste discharge requirements.</i>	APM AQ-3: Minimization of Disturbed Areas. See above.			
	APM AQ-4: Watering Prior to Grading and Excavation. See above.			
	APM AQ-6: Fugitive Dust from High Winds. See above.			
	APM BR-3: Post-construction Restoration for Reconductoring. See above.			
	APM GE-1: Geotechnical Studies. See above.			
	APM GE-2: Erosion and Sediment Control. See above.			
	APM HZ-3: Hazardous Materials Spill and Release Prevention. See above.			
	APM HZ-4: Contaminated Soil Disposal. See above.			
	APM HZ-5: Hazardous Materials Use and Storage and Hazardous Waste. See above.			
	APM PS-1: Site Cleanup. See below.			
	APM PS-2: Nonhazardous Waste Management. See below.			
<i>Impact HY-3: Substantial alteration of the existing drainage pattern of the site or area.</i>	APM AQ-3: Minimization of Disturbed Areas. See above.			
	APM BR-3: Post-construction Restoration for Reconductoring. See above.			
	APM GE-2: Erosion and Sediment Control. See above.			
	MM BR-5: Impacts on Hydrologic Features. See above.			
<i>Impact HY-8: Risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow.</i>	APM GE-1: Geotechnical Studies. See above.			
	APM GE-2: Erosion and Sediment Control. See above.			
<b>4.10 Land Use and Planning</b>				
No applicable APMs or mitigation measures.				
<b>4.11 Noise</b>				
<i>Impact NS-1: Noise levels in excess of</i>	APM NS-1: <b>Construction Hours.</b> The applicant and SCE will ensure that construction of the proposed project components will comply with all applicable City of Los Angeles, City of Santa Clarita,	CPUC monitor: Line item in monthly report	During construction	Applicant, SCE, and CPUC

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
<i>standards established in the local general plan or noise ordinance.</i>	County of Los Angeles, and County of Ventura noise regulations. Construction activities will generally be scheduled during daylight hours (7:00 a.m. to 5:00 p.m.) Monday through Friday and some Saturdays.			*Applicable to all project components
	<b>APM NS-2: Construction Noise Control Plan.</b> SCE will prepare and implement a noise control plan to address all SCE structure installation/replacement and substation modifications associated with the SCE-proposed project components. Construction measures required by the Noise Control Plan will include, but not be limited to, the following: <ul style="list-style-type: none"> <li>• Stockpiling and vehicle staging areas will be located as far away from occupied residences as possible;</li> <li>• All stationary construction equipment will be operated as far away from residential uses as possible;</li> <li>• To the extent feasible, haul routes for removing excavated materials or delivery of materials from each respective project component site will be designed to avoid residential areas and areas occupied by residential receptors (e.g., hospitals, schools, convalescent homes, etc.); and</li> <li>• Idling construction equipment will be turned off when not in use for periods longer than 15 minutes.</li> </ul>	a. Construction Noise Control Plan b. CPUC monitor: Line item in monthly report	a. Prior to and during construction b. During construction	SCE and CPUC  *Applicable to all SCE project components
	<b>APM NS-3: Notification Procedures.</b> At least two weeks prior to construction, the applicant and SCE will notify all property owners within 300 feet of construction activities.	a. Record of property owner notification b. CPUC monitor: Line item in monthly report	a. At least 2 weeks prior to construction b. Prior and/or during construction	SCE and CPUC  *Applicable to all SCE project components
	<b>MM NS-1: Noise Reduction and Control Practices.</b> SCE will employ the following noise reduction and control practices during subtransmission line reconductoring and fiber optic installation activities that could produce noise levels above 80 dBA Leq near sensitive receptors (within 100 feet):	CPUC monitor: Line item in monthly report	During construction	SCE and CPUC  *Applicable to 66-kV subtransmission line

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	<ul style="list-style-type: none"> <li>Construction equipment, stationary or mobile, will be equipped with properly operating and maintained mufflers on engine exhausts and compressor components.</li> <li>Construction equipment specifically designed for low noise emissions (i.e., equipment that is powered by electric or natural gas engines instead of diesel or gasoline reciprocating engines) will be used as much as feasible. Electric engines have been reported to have lower noise levels than internal combustion engines.</li> <li>Temporary enclosures or acoustic barriers (i.e., solid sound absorber composite materials) will be used around stationary pieces of equipment. Noise barriers or enclosures will be selected with a sound transmission class of 30 or greater, in accordance with American Society of Testing and Materials Test Method E90. Acoustical curtain enclosures can provide a sound transmission loss of 10 to 13 dBA, whereas portable solid barriers can achieve up to 33 dBA in noise reduction. Acoustic barriers will be used for all construction activities within 100 feet of closest receptors.</li> <li>Construction traffic will be routed away from residences and other sensitive receptors, as feasible.</li> <li>Noise from back-up alarms (alarms that signal vehicle travel in reverse) in construction vehicles and equipment will be reduced by providing a layout of construction sites that minimizes the need for back-up alarms and using flagmen to minimize time needed to back up vehicles. As feasible, and in compliance with the applicant's safety practices and public and worker safety provisions required in the Occupational Safety and Health Standards for the Construction Industry (29 CFR Part 1926), the applicant may also use self-adjusting, manually adjustable, or broadband back-up alarms to reduce construction noise.</li> </ul>			and Telecommunications Routes #1, #2, #3, and #4 project components
	<b>MM NS-2: Helicopter Use Notification Procedures.</b> SCE will	a. Record of helicopter use	a. Prior to and	SCE and CPUC

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	perform broad-based public outreach, using methods such as a combination of direct mail and media press releases, to provide project background and specific information concerning project construction helicopter use, including construction schedule, hours, duration, and location. At a minimum, SCE will include the City of Santa Clarita in this outreach, and will assist City staff as needed by providing or facilitating links from SCE web-based project information to an appropriate location on the City's website.	notification b. CPUC monitor: Line item in monthly report	during construction b. Prior to and during construction	*Applicable to all SCE project components that require helicopter use
	<p><b>MM NS-3: Operational Noise Control.</b> After construction of the Central Compressor Station is completed, the applicant will take measures as necessary to ensure that the operational noise levels from the Central Compressor Station do not exceed 45 dBA at the closest receptor in the City of Los Angeles. Measures that may be implemented to achieve this level during the operational phase for turbines, compressors, and cooling equipment proposed to be installed at the Central Compressor Station could include:</p> <ul style="list-style-type: none"> <li>• Turbines will be placed within an acoustical enclosure;</li> <li>• Compressor noise will be mitigated by placing an acoustical blanket over the compressor itself or enclosing the compressor within an appropriately rated acoustical building;</li> <li>• Noise emitted from gas process coolers will be mitigated by installing acoustic barriers without gaps around the equipment casing and with a continuous minimum surface density of 10 kilograms per square meter in order to minimize the transmission of sound.</li> </ul> <p>In order to ensure that operational noise levels from the Central Compressor Station do not exceed 45 dBA at the closest receptor in the City of Los Angeles, the applicant will conduct noise surveys to measure noise levels at the location of the closest receptor in the City of Los Angeles (or a public location near this receptor and between the receptor and the storage facility site) during conditions when operations at the Central Compressor Station produce the highest noise levels (i.e., during time periods when gas injection</p>	a. Reports of operational noise surveys and any noise control measures required to be implemented b. CPUC monitor: Line item in monthly report	a. After construction (during initial startup and testing of Central Compressor Station) b. After construction (during initial startup and testing of Central Compressor Station)	Applicant and CPUC  *Applicable to the Central Compressor Station project component



Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
	and withdrawal are taking place at the maximum rate). Noise surveys will be conducted during initial start-up and testing of the Central Compressor Station, and as needed to confirm that plant operations and any required mitigation reduce operational noise to less than 45 dBA at the closest receptor in the City of Los Angeles.			
Impact NS-3: Permanent increase in ambient noise levels in the project vicinity.	MM NS-3: Operational Noise Control. See above.			
	MM NS-4: Install Polymer Insulators on 66-kV Subtransmission Line. SCE will install polymer (silicon rubber) insulators on the two lines proposed to be modified on the 66-kV subtransmission system.	CPUC monitor: Line item in monthly report	During construction	SCE and CPUC  *Applicable to 66-kV subtransmission line project component
Impact NS-4: Substantial temporary or periodic increase in ambient noise levels in the project vicinity.	MM NS-1: Noise Reduction and Control Practices. See above.			
	MM NS-2: Helicopter Use Notification Procedures. See above.			
	MM NS-3: Operational Noise Control. See above.			
4.12 Population and Housing				
No applicable APMs or mitigation measures.				

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
<b>4.13 Public Services and Utilities</b>				
<i>Impact PS-1: Result in substantial adverse physical impacts associated with new or physically altered governmental facilities.</i>	MM HZ-2: Construction Fire Control and Emergency Response Measures. See above.			
	MM HZ-3: Fire Department Review and Coordination. See above.			
<i>Impact PS-5: Served by a landfill without sufficient permitted capacity to accommodate the proposed project's solid waste disposal needs.</i>	APM HZ-5: Hazardous Materials Use and Storage and Hazardous Waste. See above.			
	APM HZ-7: Wood Pole Recycling and Disposal. See above.			
	APM PS-2: Nonhazardous Waste Management. The applicant and SCE will ensure that nonhazardous waste materials, including wood, soil, vegetation, and sanitation waste (portable toilets) that would be generated during construction of the project components will either be re-used at the project component construction sites (e.g., clean soil used for backfill) or disposed of at an appropriately licensed offsite facility.	CPUC monitor: Line item in monthly report	During and after construction	Applicant, SCE, and CPUC  *Applicable to all project components

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
<i>Impact PS-6: Noncompliance with federal, state, or local statutes and regulations related to solid waste.</i>	APM HZ-5: Hazardous Materials Use and Storage and Hazardous Waste. See above.			
	APM PS-1: Site Cleanup. The applicant and SCE will direct construction contractors to perform initial site cleanup immediately following construction activities at each of the proposed project components. Initial site cleanup at each project component area will include the following: <ul style="list-style-type: none"><li>Removal of all construction debris;</li><li>Proper disposal or recycling of all construction materials and debris at appropriately licensed landfills and other offsite facilities; and</li><li>Inspection of project component sites to ensure that cleanup activities are successfully completed.</li></ul>	a. Record of cleanup inspection (including photo documentation as needed)  b. CPUC monitor: Line item in monthly report	a. Immediately after construction is completed at each project component construction site  b. During and after construction	Applicant, SCE, and CPUC  *Applicable to all project components
	APM PS-2: Nonhazardous Waste Management. See above.			
4.14 Recreation				
No applicable APMs or mitigation measures.				
4.15 Transportation and Traffic				
<i>Impact TT-1: Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel</i>	APM TT-1: Traffic Control Plan. The applicant and SCE will prepare Traffic Control Plans in accordance with the latest version of the California Joint Utility Traffic Control Manual. These Traffic Control Plans will be implemented by the applicant and SCE as needed. The Traffic Control Plans will be developed to minimize short-term construction-related impacts on local traffic and potential traffic safety hazards, and will include measures such as the installation of temporary warning signs at strategic locations near access locations for the project components. The signs will be removed after construction-related activities are completed. The Traffic Control Plans may include the following measures: <ul style="list-style-type: none"><li>Coordination with the City of Los Angeles, City of Santa Clarita, County of Los Angeles, or County of Ventura on any temporary land or road closures;</li><li>Installation of traffic control devices as specified in the</li></ul>	a. Traffic Control Plans  b. Emergency Access Plans (as needed)  c. Record of coordination with jurisdiction representatives and emergency services providers if such coordination is specified in the Traffic Control Plan  d. CPUC monitor: Line item in monthly report	a. Prior to and during construction  b. Prior to and during construction  c. Prior to and during construction  d. Prior to and during construction	Applicant, SCE, and CPUC  *Applicable to all project components

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
<i>and relevant components of the circulation system including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.</i>	California Joint Utility Traffic Control Manual; <ul style="list-style-type: none"> <li>Provisions for temporary alternate routes to route local traffic around construction zones; and</li> <li>Consultation with emergency service providers and development of an Emergency Access Plan for emergency vehicle access in and adjacent to the construction zone.</li> </ul>			
	<b>APM TT-3: Commuter Plan.</b> The applicant would implement a Commuter Plan that includes a designated offsite parking area that has adequate parking capacity for 150 workers (the peak construction-activity maximum not including SCE workers) and a shuttle that would transport worker crews (approximately 10 workers per trip) from the parking area to worksites.	a. Commuter Plan b. CPUC monitor: Line item in monthly report	a. Prior to and during construction b. Prior to and during construction	Applicant and CPUC  *Applicable to all project components constructed by the applicant
<i>Impact TT-2: Conflict with an applicable congestion management program including, but not limited to, LOS standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.</i>	<b>APM TT-1: Traffic Control Plan.</b> See above.			
	<b>APM TT-3: Commuter Plan.</b> See above.			

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
<i>Impact TT-3: Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).</i>	APM TT-1: Traffic Control Plan. See above.			
<i>Impact TT-4: Result in inadequate emergency access.</i>	APM TT-1: Traffic Control Plan. See above.			
	APM TT-3: Commuter Plan. See above.			
	MM TT-1: City of Santa Clarita Traffic Engineer Review. Prior to commencing work within Santa Clarita city boundaries, SCE will submit their Traffic Control Plan for the project to the City of Santa Clarita traffic engineer, and incorporate any recommendations from this review into the Traffic Control Plan.	<ul style="list-style-type: none"> <li>a. Record of Traffic Control Plan review by City of Santa Clarita traffic engineer</li> <li>b. Record of Traffic Control Plan revisions as required after review by the City of Santa Clarita traffic engineer</li> <li>c. CPUC monitor: Line item in monthly report</li> </ul>	<ul style="list-style-type: none"> <li>a. Prior to construction</li> <li>b. Prior to construction</li> <li>c. Prior to and during construction</li> </ul>	<p>SCE and CPUC</p> <p>*Applicable to project components constructed by SCE within the City of Santa Clarita</p>

Table 5-1 Mitigation Monitoring, Compliance, and Reporting Program

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Component/s
<i>Impact TT-5: Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.</i>	APM TT-1: Traffic Control Plan. See above.			
	APM TT-2: Repair of Damaged Roads. The applicant and SCE will ensure that damage to existing roads that is the direct result of activities related to construction of the proposed project components will be repaired once construction is complete in accordance with local jurisdiction requirements and/or existing franchise agreements held by the applicant and SCE.	a. Record of roadway repair, including photo documentation showing roadways prior to and following construction b. CPUC monitor: Line item in monthly report	a. Within 3 months after construction b. After construction	Applicant, SCE, and CPUC  *Applicable to all project components

Source: Ecology and Environment, Inc. 2013, SoCalGas 2009–2012

Notes:

<sup>(a)</sup> All compliance documentation and consultation records to be available for CPUC staff review on request.