

# **ATTACHMENT A**

## **REDLINED CHANGES TO APMs AND MMs**

## ATTACHMENT "A"

### APM BR-4: 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 in accordance with the U.S. Fish and Wildlife Service Coastal California Gnatcatcher (*Poliopitila californica californica*) Presence/Absence Survey Guidelines, February 28, 1997 ([protocol](#)). 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, a qualified biologist must identify the boundaries of the pair's territory and the applicant and SCE must not conduct construction activities within 500 feet of the territory.~~ If infeasible to maintain a buffer of 500 feet from an active gnatcatcher ~~nest territory,~~ ~~work~~ ~~construction activities~~ 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~~), or the applicant must consult with USFWS to determine alternative actions. Areas of 2 or more contiguous acres of suitable coastal California gnatcatcher habitat will be identified at the time of pre-construction surveys. ~~The applicant and SCE may conduct construction activities in gnatcatcher habitat during the breeding and nesting season if protocol-level surveys (conducted no later than one year prior to construction activities per protocol) confirm the absence of breeding gnatcatchers, or if the 500-foot protective buffer from all active gnatcatcher territories can be maintained 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).~~

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**MM BR-5: Impacts on Hydrologic Features.** Prior to project construction, for all proposed project components in the vicinity of hydrologic features, the applicant and SCE will:

4. Complete formal delineations per USACE protocols to confirm and determine the extent of jurisdictional wetlands present in the proposed project areas;
5. 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;
6. 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 ration 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
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 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 feature, ~~and/or cannot maintain the 50-foot exclusionary buffer,~~ will be performed only when water is not present in the feature, ~~unless otherwise allowed by the USACE and CDFW within the conditions of any respective permits and/or authorizations including the conditions of the SWPPP; or, if the applicant or SCE cannot maintain the 50-foot exclusionary buffer from the bed or bank of a drainage feature during project construction, the applicant or SCE will provide standard BMP and SWPPP measures to prevent any solid or liquid materials from entering the drainage. If the applicant or SCE cannot maintain the 50-foot exclusionary buffer from the bed or bank of a drainage feature during project construction, the applicant or SCE will submit proposed BMP and SWPPP measures~~ ~~BMPs as outlined in the SWPPP to CPUC staff for review and approval prior to construction.~~

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### MM BR-15: Restoration of Native Oak Trees:

~~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 fully mitigate for any trees damaged or removed. The applicant and SCE will prepare oak tree evaluation surveys and oak tree replacement mitigation 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, (i.e., an arborist with extensive local or regional expertise in the planting, care and maintenance of oak trees), 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 45:1 ratio.

Oak tree mitigation may be comprised of on-site or off-site planting of oak trees at the prescribed mitigation ratio (4:1) or through the purchase of mitigation bank credits from an approved mitigation bank. If a mitigation bank is utilized, the credit purchase shall equal the total area required for mitigation for the impacts (i.e., sufficient credits to meet or exceed the area needed for 4:1 replacement of impacted individual trees). The oak tree replacement mitigation plans that will be submitted by the applicant and SCE to CPUC staff for review and approval prior to construction will include, at a minimum:

1. The estimated number of trees that will be damaged or removed during project construction;
2. Specific planting details (e.g., size of saplings, size of containers, proposed planting depth, and watering regimes);
3. Specific protection measures (e.g., measures to prevent damage to replacement oak tree plantings from animals and other sources);
4. Success criteria;
5. Monitoring and maintenance schedule; and
6. Proposed planting locations with specific baseline information on existing soil types, existing tree and shrub density, and proposed oak tree planting density and spacing.

Replacement tree planting will be monitored by a qualified arborist, who will ensure the implementation of the following:

1. Planting of rReplacement trees will occur ~~will be initially planted in 15 gallon containers, and then permanently planted in suitable areas. The planting of replacement oak trees may occur on-site or off-site.~~
- ~~4-2. or through the purchase of mitigation lands deemed suitable by the arborist;~~
- ~~2-3.~~ 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;
- ~~3-4.~~ Other measures determined necessary by the arborist to ensure the success of all (100 at least 75 percent) of tree replacement plantings.

Tree removal shall not be permitted until replacement trees have been planted or transplanting mitigation sites are approved by the CPUC staff.

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**MM NS-32: 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

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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:

- | 4-5. Turbines will be placed within an acoustical enclosure;
- | 5-6. Compressor noise will be mitigated by placing an acoustical blanket over the compressor itself or enclosing the compressor within an appropriately rated acoustical building;
- | 6-7. 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.

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.

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**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 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), and SCE's fire prevention plan prepared pursuant to CPUC Decision 12-01-032.

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. If construction activities take place concurrently at more than one project component area, and such areas are close by in proximity (e.g., within the storage field area), one Fire Risk Manager may monitor more than one project component area during the same period of construction.

1. The Fire Risk Managers shall:
  - a) Be responsible for preventing, detecting, controlling, and extinguishing fires set accidentally as a result of construction activity;
  - b) Review the Fire Control and Emergency Response Measures with ~~the fire patrol person~~ and construction employees prior to starting work at each project area;
  - c) 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; in incipient stage fire prevention, control, and extinguishing (e.g., the fire can be controlled or extinguished by portable fire extinguishers, small hose systems, or portable water supplies without the need for protective clothing or breathing apparatus), and fire reporting. Each member of the construction crew shall be trained and equipped to extinguish small fires;

~~f. Be equipped with radio or cell phone communication capability; and~~

d) Ensure that no personnel shall fight a fire beyond the incipient stage and/or after the arrival of professional fire suppression personnel (local Fire Departments or CAL FIRE personnel);

e) Ensure that Fire Risk Manager and all construction crews are provided with radio and cellular telephone access that is operational within each project area to allow for immediate reporting of fires, by ensuring that communication pathways and equipment are tested and confirmed operational each day prior to initiating construction activities at each project component area; and

f) Maintain an updated key personnel and emergency services contact (telephone and email) list, kept onsite and made available as needed to construction personnel.

2. Equipment shall include:

- 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;
- b) One shovel and one pressurized chemical fire extinguisher for each motorized vehicle or each gasoline-powered tool (if not accompanied by a motorized vehicle), including but not restricted to compressors, hydraulic accumulators, gardening tools (such as chain saws and weed trimmers), soil augers, rock drills, etc.;
- c) Fire suppression equipment to be kept on all vehicles used for project construction; and
- d) An onboard self-extinguishing fire suppression system extinguisher capable of extinguishing any equipment-caused fire to be kept on heavy construction operating equipment.

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:

- a) The installation of fire extinguishers at the proposed Central Compressor Station site;
- 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;
- 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;
- 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;
- 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;
- f) Prevention of the idling of vehicles with hot exhaust manifolds on dirt roads with dead combustible vegetation under the vehicle;
- 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~~
- h) Ensuring that at least one crew member is within 100 yards at all times of a vehicle containing equipment necessary for fire suppression as outlined above;

- i) The immediate reporting of all fires to the Fire Risk Manager in the project component area; and
- j) Any additional measures as needed during construction to address fire prevention and detection, to lower the risk of wildland fires.

4. Measures will also include the following requirements that would involve coordination between the applicant and SCE, and the Fire Departments and CAL FIRE:

- a) The applicant's and SCE's respective Fire Risk Managers shall serve as liaisons to the Fire Departments and CAL FIRE during the project's construction; contractors shall furnish any and all fire phase and equipment to extinguish any uncontrolled fire; provide a point of contact for the Fire Departments and CAL FIRE in the event of a fire near the project component areas as directed by Fire Department or CAL FIRE representatives in an emergency;
- 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
- 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.

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 necessary;
- d) Procedures for use of a fire guard as necessary; and
- e) Additional fire suppression tools and fire suppression equipment, and training requirements.