

Attachment G

**Mitigation Measures and Applicant Proposed Measures
from the Mitigation, Monitoring, and Compliance
Reporting Program**

Excerpts from the Public Health and Safety and Hydrology and Water Resources Sections of the Mitigation Monitoring Compliance and Reporting Program (MMCRP) (May 26, 2011) for Southern California Edison's Devers–Palo Verde 500kv No. 2 Transmission Line Project (Provided by Southern California Edison)

Table CRS-3. Mitigation Measures and Applicant Proposed Measures – Public Health and Safety

MITIGATION MEASURE	— MM P-1a: Develop Hazardous Substance Control and Emergency Response Plan. A Hazardous Substance Control and Emergency Response Plan shall be prepared for the project, and a copy shall be kept on site (or in vehicles) during construction and maintenance of the project. SCE shall document compliance by submitting the plan to the CPUC or BLM or USFWS, as appropriate, for review and approval at least 60 days before the start of construction.
Location	All locations along the proposed and alternative routes.
Monitoring / Reporting Action	Review and approve plan and ensure it is implemented in the field.
Responsible Agency	BLM, CPUC, and USFWS
Timing	Prior to and during construction
Interpretation & Approach	Measure will be implemented.
MITIGATION MEASURE	— MM P-1b: Conduct environmental training and monitoring program. An environmental training program shall be established to communicate environmental concerns and appropriate work practices, including spill prevention, emergency response measures, and proper Best Management Practice (BMP) implementation, to all field personnel prior to the start of construction. The training program shall emphasize site-specific physical conditions to improve hazard prevention (e.g., identification of potentially hazardous substances) and shall include a review of all site-specific plans, including but not limited to, the project's Storm Water Pollution Prevention Plan and the Hazardous Substances Control and Emergency Response Plan.
Location	All locations along the proposed and alternative routes.
Monitoring / Reporting Action	Review documentation of training
Responsible Agency	BLM, CPUC, and USFWS
Timing	Prior to and during construction
Interpretation & Approach	Measure will be implemented.
MITIGATION MEASURE	— (MM P-1b) SCE shall document compliance by (a) submitting to the CPUC or BLM or USFWS, as appropriate, for review and approval an outline of the proposed Environmental Training and Monitoring Program, and (b) maintaining for monitor review a list of names of all construction personnel who have completed the training program.
Location	All locations along the proposed and alternative routes.
Monitoring / Reporting Action	Review documentation of training
Responsible Agency	BLM, CPUC, and USFWS
Timing	Prior to construction
Interpretation & Approach	Measure will be implemented.
MITIGATION MEASURE	— (MM P-1b) Best Management Practices, as identified in the project Storm Water Pollution Prevention Plan and the Hazardous Substances Control and Emergency Response Plan, shall be implemented during the construction of the project to minimize the risk of an accidental release and provide the necessary information for emergency response.
Location	All locations along the proposed and alternative routes.
Monitoring / Reporting Action	Monitor BMP implementation
Responsible Agency	BLM, CPUC, and USFWS
Timing	During construction
Interpretation & Approach	Measure will be implemented.

Table CRS-3. Mitigation Measures and Applicant Proposed Measures – Public Health and Safety

MITIGATION MEASURE	— MM P-1c: Ensure proper disposal of construction waste. All non-hazardous construction and demolition waste, including trash and litter, garbage, and other solid waste shall be disposed of properly. Petroleum products and other potentially hazardous materials shall be removed to a hazardous waste facility permitted or otherwise authorized to treat, store, or dispose of such materials.
Location	All locations along the proposed and alternative routes.
Monitoring / Reporting Action	Observe construction activities for compliance and review manifest for hazardous waste disposal.
Responsible Agency	BLM and CPUC Timing During construction
Interpretation & Approach	Measure will be implemented.
MITIGATION MEASURE	— MM P-1d: Maintain emergency spill supplies and equipment. Hazardous material spill kits shall be maintained at all construction sites for small spills. This shall include oil-absorbent material, tarps, and storage drums to be used to contain and control any minor releases. Emergency spill supplies and equipment shall be kept adjacent to all work areas and staging areas, and shall be clearly marked.
Location	All locations along the proposed and alternative routes.
Monitoring / Reporting Action	Observe construction sites and activities for compliance
Responsible Agency	BLM and CPUC Timing During construction
Interpretation & Approach	Measure will be implemented.
MITIGATION MEASURE	— (MM P-1d) Detailed information for responding to accidental spills and for handling any resulting hazardous materials shall be provided in the project's Hazardous Substances Control and Emergency Response Plan.
Location	All locations along the proposed and alternative routes.
Monitoring / Reporting Action	Review HSCERP
Responsible Agency	BLM and CPUC Timing Prior to construction
Interpretation & Approach	Measure will be implemented.
MITIGATION MEASURE	— MM P-2a: Identify pesticide/herbicide contamination. Soil samples shall be collected in construction areas where the land has historically or is currently being farmed to identify the possibility of and to delineate the extent of pesticide and/or herbicide contamination.
Location	All proposed and alternative route segments that are within or immediately adjacent to agricultural uses.
Monitoring / Reporting Action	CPUC Monitor to review sample results
Responsible Agency	CPUC, BLM, and appropriate local and State regulatory agencies
Timing	Prior to construction
Interpretation & Approach	Measure will be implemented.
MITIGATION MEASURE	— (MM P-2a) Excavated materials containing elevated levels of pesticide or herbicide will require special handling and disposal procedures. Standard dust suppression procedures (as defined in Mitigation Measure AQ-1a) shall be used in construction areas to reduce airborne emissions of these contaminants and reduce the risk of exposure to workers and the public. Regulatory agencies for the state of California (as appropriate) and the appropriate county shall be contacted to provide oversight regarding the handling, treatment, and/or disposal options.

Table CRS-3. Mitigation Measures and Applicant Proposed Measures – Public Health and Safety

Location	All proposed and alternative route segments that are within or immediately adjacent to agricultural uses.
Monitoring / Reporting Action	Observe construction sites and activities for compliance. Review documentation for required special handling and disposal.
Responsible Agency	CPUC, BLM, and appropriate local and State regulatory agencies
Timing	During construction
Interpretation & Approach	Measure will be implemented.
MITIGATION MEASURE	— MM P-3a: Observe exposed soil for evidence of contamination. During grading or excavation work, the construction contractor shall observe the exposed soil for visual evidence of contamination. If visual contamination indicators are observed during construction, the contractor shall stop work until the material is properly characterized and appropriate measures are taken to protect human health and the environment. The contractor shall comply with all local, State, and federal requirements for sampling and testing, and subsequent removal, transport, and disposal of hazardous materials. Additionally, in the event that evidence of contamination is observed, the contractor shall document the exact location of the contamination and shall immediately notify the CPUC or BLM, describing proposed actions. A weekly report listing encounters with contaminated soils and describing actions taken shall be submitted to the CPUC or BLM.
Location	All proposed and alternative route segments that are within or immediately adjacent to industrial and/or commercial land use areas.
Monitoring / Reporting Action	Observe construction sites and activities for compliance and review weekly reports.
Responsible Agency	BLM and CPUC
Timing	During construction
Interpretation & Approach	If contamination is encountered, the contractor will immediately notify SCE, who will then immediately notify the CPUC or BLM.
MITIGATION MEASURE	— MM P-4a: Prepare Spill Prevention, Countermeasure, and Control Plans. To minimize, avoid, and/or clean up unforeseen spill of hazardous materials during operation of the proposed facilities, SCE shall update or prepare, if necessary, the Spill Prevention, Countermeasure, and Control plan for each substation, series capacitors, and the switchyard. SCE shall document compliance by providing a copy of the Spill Prevention, Control, and Countermeasures plans to the CPUC or BLM or USFWS, as appropriate, for review and approval at least 60 days before the start of operation.
Location	All proposed existing, and alternative substations, switching stations, and series capacitor banks.
Monitoring / Reporting Action	Review and approve plans and observe construction sites and activities for compliance
Responsible Agency	BLM, CPUC, and USFWS
Timing	During construction and post construction (60 days before operation)
Interpretation & Approach	Measure will be implemented.
MITIGATION MEASURE	MM PS-1a: Limit the conductor surface electric gradient. As part of the design and construction process for the Proposed Project, the Applicant shall limit the conductor surface electric gradient in accordance with the IEEE Radio Noise Design Guide.
Location	Along the overhead route segment
Monitoring / Reporting Action	Review construction design plans to ensure consistency with IEEE Radio Noise Design Guide.
Responsible Agency	CPUC
Timing	Prior to construction.
Interpretation & Approach	Measure will be implemented.

Table CRS-3. Mitigation Measures and Applicant Proposed Measures – Public Health and Safety

MITIGATION MEASURE	MM PS-1b: Document and Resolve Electronic Interference Complaints. After energizing the transmission line, SCE shall respond to and document all radio/television/equipment interference complaints received and the responsive action taken. These records shall be made available to the CPUC for review upon request. All unresolved disputes shall be referred by SCE to the CPUC for resolution.
Location	Along the overhead route segment
Monitoring / Reporting Action	Review documentation provided.
Responsible Agency	CPUC
Timing	During the operations of the project.
Interpretation & Approach	Measure will be implemented.
MITIGATION MEASURE	MM PS-2a: Implement Grounding Measures. As part of the siting and construction process for the Proposed Project, SCE shall identify objects (such as fences, metal buildings, and pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.
Location	Along the entire transmission line route
Monitoring / Reporting Action	Review documentation provided; verify that necessary grounding measures are installed.
Responsible Agency	CPUC
Timing	Prior to energizing the transmission line.
Interpretation & Approach	Measure will be implemented.

Table CRS-4. Mitigation Measures and Applicant Proposed Measures – Hydrology and Water Resources
Note: Public Health & Safety measures are NOT repeated here (see Table CRS-3).

MITIGATION MEASURE	— MM H-1a: Restore disturbed soil with re-vegetation or construction of permanent erosion-control structures. Soil disturbance at towers and access roads shall be the minimum necessary and designed to prevent long-term erosion through revegetation or construction of permanent erosion control structures according to plans to be reviewed and approved by the U.S. Forest Service. Copies of the final approved plans shall be submitted to the CPUC/BLM for their files.
Location	Forest Service land in areas of steep terrain
Monitoring / Reporting Action	Final design plans shall include re-vegetation and erosion control specifications. CPUC/BLM to verify implementation.
Responsible Agency	BLM and CPUC
Timing	Prior to, during, and post construction
Interpretation & Approach	Supplementing the required SWPPP and APMs that address short-term/temporary erosion impacts, disturbed soils will be re-vegetated or permanent erosion control structures installed in order to minimize and/or avoid long-term erosion that could result in water quality degradation. Measure is applicable to areas subject to erosion. Any revegetation of disturbed soils will be consistent with the BLM restoration/rehabilitation approach in the Habitat Restoration and Compensation Plan required under MM B-1.
MITIGATION MEASURE	— H-6a: Design diversion dikes or other site remediations to avoid damage to adjacent property. Where diversion dikes are required to protect towers or other project structures from flooding or erosion, these dikes shall be so designed as to avoid increasing the risk of erosion or flooding onto adjacent areas where life or property could be threatened. Diversion dike designs shall be submitted to the CPUC and BLM for review and approval at least 60 days prior to construction.
Location	Any tower in or adjacent to a watercourse and requiring diversion dikes to protect the tower from the watercourse.
Monitoring / Reporting Action	Dike designs shall be submitted to the CPUC/BLM for review and approval. CPUC/BLM to take steps to ensure compliance. Steps may include requesting modifications to the plans, seeking approval from appropriate local, State or federal agencies, or consulting with adjacent landowners
Responsible Agency	BLM and CPUC
Timing	Plans to be approved by BLM and CPUC 60 days prior to construction.
Interpretation & Approach	Diversion dikes that would be implemented per APMs W-4 through W-6 could result in adverse impacts to adjacent property through diversion and concentration of flows, thus requiring this mitigation measure to ensure proper design of dikes and minimization of associated impacts. Measure will be implemented
MITIGATION MEASURE	— APM W-1: During the first year following construction, potential soil erosion sites will be inspected by the Holder after each major rainstorm as access permits. For the purpose of this measure, a major rainstorm is defined as any singular storm where the total precipitation exceeds the arithmetic mean for similar events in the area and results in flooding. Examples include cloudbursts (high quantity – short duration) or storms where saturated soils produce runoff (high quantity – long duration). (BLM B-4.1)
Location	Entire project.
Monitoring / Reporting Action	CPUC/BLM to ensure that SCE inspects all sites subject to potential erosion following each major rainstorm.
Responsible Agency	BLM and CPUC
Timing	During the first year following construction.
Interpretation & Approach	Measure will be implemented to reduce the amount of erosion and sedimentation that would result from storm events that affect areas disturbed by Project construction.
MITIGATION MEASURE	— APM W-2: Construction equipment will be kept out of flowing stream channels except when absolutely necessary to construct crossings. (BLM B-4.2)
Location	All project locations where flowing stream channels are present.

Table CRS-4. Mitigation Measures and Applicant Proposed Measures – Hydrology and Water Resources
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Monitoring / Reporting Action	BLM/CPUC to monitor compliance
Responsible Agency	BLM and CPUC
Timing	Prior to and during construction.
Interpretation & Approach	Measure will be implemented to minimize the potential for surface water resources to be adversely affected by Project construction equipment.
MITIGATION MEASURE	— APM W-3: Erosion control and hazardous material plans will be incorporated into the construction bidding specifications to ensure compliance. (BLM B-4.3)
Location	Entire project.
Monitoring / Reporting Action	CPUC/BLM to verify based on review of specifications
Responsible Agency	BLM and CPUC
Timing	Prior to and during construction
Interpretation & Approach	Measure will be implemented to ensure that erosion control and hazardous material plans are employed during construction of the project, reducing the potential for Project-related erosion, sedimentation, and/or hazardous materials spill(s) to result in water quality degradation.
MITIGATION MEASURE	— APM W-4: Appropriate design of tower footing foundations, such as raised foundations and/or enclosing flood control dikes, will be used to prevent scour and/or inundation by a 100-year flood. (BLM B-4.4)
Location	All locations where Project infrastructure would be placed in a FEMA-designated 100-year Flood Hazard Area.
Monitoring / Reporting Action	BLM/CPUC to monitor compliance
Responsible Agency	BLM and CPUC
Timing	Prior to and during construction.
Interpretation & Approach	Measure will be implemented to ensure that the placement of Project infrastructure does not result in flood-related damage to the infrastructure or to surrounding/downstream areas.
MITIGATION MEASURE	— APM W-5: Towers will be located to the extent feasible to avoid active drainage channels, especially downstream of steep hillslope areas, to minimize the potential for damage by flash flooding and mud and debris flows. (BLM B-4.5)
Location	Entire project.
Monitoring / Reporting Action	BLM / CPUC to monitor compliance
Responsible Agency	BLM and CPUC
Timing	Prior to and during construction.
Interpretation & Approach	Measure will be implemented to minimize the potential for the placement of Project infrastructure to cause damage to the infrastructure and/or surrounding area(s) as a result of flash flooding, mudflow, or debris flow.
MITIGATION MEASURE	— APM W-6: Diversion dikes or other structural enhancements will be required to divert runoff around a tower structure if (a) the location in an active channel cannot be avoided; and (b) where there is a very significant flood scour/deposition threat, unless specifically exempted by the BLM Authorized Officer. (BLM B-4.6)
Location	Entire project
Monitoring / Reporting Action	BLM / CPUC to monitor compliance
Responsible Agency	BLM and CPUC
Timing	Prior to and during construction

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Interpretation & Approach	Measure will be implemented to minimize the potential for flood-related impacts to occur as a result of infrastructure placement within an active channel or an area of high flood scour/deposition threat.
MITIGATION MEASURE	— APM W-7: Runoff from roadways will be collected and diverted from steep, disturbed, or otherwise unstable slopes. (BLM B-4.7)
Location	All roadways along the project.
Monitoring / Reporting Action	BLM / CPUC to monitor compliance
Responsible Agency	BLM and CPUC
Timing	During construction
Interpretation & Approach	Measure will be implemented to prevent surface water runoff from Project roadways from resulting in erosion and sedimentation that could cause water quality degradation.
MITIGATION MEASURE	— APM W-8: Ditches and drainage concourses will be designed to handle the concentrated runoff, will be located to avoid disturbed areas, and will have energy dissipations at discharge points. (BLM B-4.8)
Location	All ditches and drainage concourses designed for the project.
Monitoring / Reporting Action	BLM / CPUC to monitor compliance
Responsible Agency	BLM and CPUC
Timing	Prior to and during construction
Interpretation & Approach	Measure will be implemented to ensure that stormwater drainage features (ditches and drainage concourses) are appropriately designed to accommodate concentrated runoff and to prevent flooding or erosion and sedimentation.
MITIGATION MEASURE	— APM W-9: Cut and fill slopes will be minimized by a combination of benching and following natural topography where possible. (BLM B-4.9)
Location	All locations where construction would occur on a slope.
Monitoring / Reporting Action	BLM / CPUC to monitor compliance
Responsible Agency	BLM and CPUC
Timing	Prior to and during construction
Interpretation & Approach	Measure will be implemented to minimize earth disturbance associated with hillside construction, and minimize the potential for erosion and sedimentation that could result in water quality degradation.