

Exhibit 2 to Attachment B Mitigation Monitoring and Reporting Program (MMRP)

5 MITIGATION MONITORING AND REPORTING PROGRAM

The California Department of Toxic Substances Control (DTSC) prepared an environmental impact report (EIR) in accordance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code, Section 21000 et seq.; California Code of Regulations Title 14 Section 15000 et seq. [CEQA Guidelines]). The EIR evaluates the potential significant environmental impacts associated with the cleanup and remediation of contaminated groundwater at the Pacific Gas and Electric (PG&E) Topock Compressor Station (compressor station).

The EIR concludes that implementation of the Topock Compressor Station Groundwater Remediation Project would generate significant adverse environmental impacts on the physical environment. For most potential impacts, the EIR prescribes mitigation capable of reducing these impacts to less-than-significant levels.

Section 21081.6 of the California Public Resources Code requires a public agency to adopt a reporting or monitoring program at the time of approval for changes to the project that it has adopted and incorporated into the project. The program must be designed to avoid, mitigate, or minimize significant effects on the physical environment. These conditions are also referred to as mitigation measures.

This mitigation monitoring and reporting program (MMRP) is to be used by DTSC to ensure that adopted mitigation measures identified in the EIR are implemented and that implementation is documented. The MMRP is presented in tabular format (Table 5-1). The table columns contain the following information:

Mitigation Number: Lists the mitigation measures by number, as designated in the EIR, and by issue area.

Mitigation Measure: Provides the text of the mitigation measures (by issue area), as provided in the EIR, each of which has been adopted and incorporated into the project.

Timing/Schedule: Lists the time frame in which the mitigation is expected to take place.

Implementation Responsibility: Identifies the entity responsible for complying with the requirements and conditions of the mitigation measure.

Completion of Implementation: DTSC is responsible for ensuring these mitigation measures are implemented. The “Action” column is to be used by the DTSC to describe the action(s) taken to complete implementation. The “Date Completed” column is to be used to indicate when implementation of the mitigation measure has been completed. The DTSC, at their discretion, may delegate implementation responsibility or portions thereof to qualified consultants or contractors. However, DTSC still maintains overall responsibility for implementation of mitigation adopted or incorporated into the project.

**Table 5-1
Mitigation Monitoring and Reporting Program for the Topock Compressor Station Groundwater Remediation Project**

Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
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Aesthetics					
AES-1	<p>Impacts on Views from Topock Maze Locus B, a Scenic Vista (Key View 5)</p> <p>The proposed project shall be designed and implemented to adhere to the design criteria presented below.</p> <p>a) Existing mature plant specimens shall be protected in place during construction, operation, and decommissioning phases <u>consistent with CUL1a-5</u>. The identification of plant specimens that are determined to be mature and retained shall occur as part of the design phase and mapped/identified by a qualified plant ecologist or biologist and integrated into the final design and project implementation.</p> <p>b) Revegetation of disturbed areas within the riparian vegetation along the Colorado River shall occur concurrently with construction operations. Plans and specifications for revegetation shall be developed by a qualified plant ecologist or biologist before any riparian vegetation is disturbed <u>and shall be implemented consistent with CUL1a-5</u>. The revegetation plan shall include specification of maintenance and monitoring requirements, which shall be implemented for a period of 5 years after project construction or after the vegetation has successfully established, as determined by a qualified plant ecologist or biologist.</p>	During project design and before construction	PG&E		
	c) Plant material shall be consistent with surrounding native vegetation.				
	d) The color of the wells, pipelines, reagent storage tanks, control structures, and utilities shall consist of muted, earth-tone colors that are consistent with the surrounding natural color palette. Matte finishes shall be used to prevent reflectivity along the view corridor. Integral color concrete should be used in place of standard gray	During project design and during construction	PG&E		

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	<p>concrete.</p> <p>e) The final revegetation plans and specifications shall be reviewed and approved by an architect, landscape architect, or allied design professional licensed in the State of California to ensure that the design objectives and criteria are being met. Planting associated with biological mitigation may contribute to, but may not fully satisfy, visual mitigation.</p>				
AES-2	<p>Impacts on Views from Colorado River, a Scenic Resources Corridor (Key View 11)</p> <p>The proposed project shall be designed and implemented to adhere to the design criteria presented below.</p> <p>a) A minimum setback requirement of 20 feet from the water (ordinary high water mark) shall be enforced, except with regard to any required river intake facilities, to prevent substantial vegetation removal along the riverbank.</p> <p>b) Existing mature plant specimens shall be protected in place during construction, operation, and decommissioning phases. The identification of plant specimens that are determined to be mature and retained shall occur as part of the design phase and mapped/identified by a qualified plant ecologist or biologist and integrated into the final design and project implementation <u>consistent with CUL1a-5</u>.</p> <p>c) Revegetation of disturbed areas within the riparian vegetation along the Colorado River shall occur concurrently with construction operations. Plans and specifications for revegetation shall be developed by a qualified plant ecologist or biologist before any riparian vegetation is disturbed. The revegetation plan shall include specification of maintenance and monitoring requirements, which shall be implemented for a period of 5 years after project construction or after the vegetation has successfully established, as determined by a qualified plant ecologist or biologist.</p>	<p>During project design and during construction</p>	<p>PG&E</p>		

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	d) Plant material shall be consistent with surrounding native vegetation. e) The color of the wells, pipelines, and utilities shall consist of muted, earth-tone colors that are consistent with the surrounding natural color palette. Matte finishes shall be used to prevent reflectivity along the view corridor. Integral color concrete should be used in place of standard gray concrete. f) The final revegetation plans and specifications shall be reviewed and approved by an architect, landscape architect, or allied design professional licensed in the State of California to ensure that the design objectives and criteria are being met. Planting associated with biological mitigation may contribute to, but may not fully satisfy, visual mitigation.				
AES-3	<p>Impacts on Visual Quality and Character along the Colorado River (Key View 11).</p> <p>Mitigation Measure AES-1 shall be implemented. Implementation of Mitigation Measures AES-1 would reduce the overall change to the visual character of the view corridor along the Colorado River. Although the proposed project would still be visible, incorporating a facilities design that is aesthetically sensitive and preserving the vegetation would blend the proposed project into their visual setting within the floodplain and would reduce the overall contrast of the proposed project.</p>	During project design and before construction	PG&E		
Air Quality					
AIR-1	<p>Short-Term Construction-Related Emissions of Criteria Air Pollutants and Precursors</p> <p>PG&E shall implement the fugitive dust control measures below for any construction and/or demolition activities:</p> <p>a) Use periodic watering for short-term stabilization of disturbed surface area to minimize visible fugitive dust emissions during dust episodes. Use of a water truck to maintain moist disturbed surfaces and actively spread water during visible dusting episodes shall be considered</p>	During construction and demolition	PG&E		

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	<p>sufficient;</p> <p>b) Cover loaded haul vehicles while operating on publicly maintained paved surfaces;</p> <p>c) Stabilize (using soil binders or establish vegetative cover) graded site surfaces upon completion of grading when subsequent development is delayed or expected to be delayed more than 30 days, except when such delay is caused by precipitation that dampens the disturbed surface sufficiently to eliminate visible fugitive dust emissions;</p> <p>d) Cleanup project-related track out or spills on publicly maintained paved surfaces within twenty-four hours; and</p> <p>e) Curtail nonessential earth-moving activity under high wind conditions (greater than 25 miles per hour) or develop a plan to control dust during high wind conditions. For purposes of this rule, a reduction in earth-moving activity when visible dusting occurs from moist and dry surfaces due to wind erosion shall be considered sufficient to maintain compliance.</p>				
Biological Resources					
BIO-1	<p>Potential Fill of Wetlands and Other Waters of the United States and Disturbance or Removal of Riparian Habitat.</p> <p>Areas of sensitive habitat in the project area have been identified during project surveys. These areas include floodplain and riparian areas, wetlands, and waters of the United States. Habitats designated by DFG as sensitive, including desert washes and desert riparian, are also included. To the extent feasible, elements of the project shall be designed to avoid direct effects on these sensitive areas. During the design process and before ground disturbing activities <u>within such areas (not including East Ravine)</u>, a qualified biologist shall coordinate with PG&E to ensure that the footprints of construction zones, drill pads, staging areas, and access routes are designed to avoid disturbance of sensitive habitats to the extent feasible. DTSC shall be responsible for enforcing compliance with design and all</p>	<p>During project design and before construction <u>(not including East Ravine)</u></p>	PG&E		

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	<p>preconstruction measures.</p> <p>If during the design process it is shown that complete avoidance of habitats under USACE jurisdiction is not feasible, the Section 404 permitting process shall be completed, or the substantive equivalent per CERCLA Section 121(e)(1). In either event, the acreage of affected jurisdictional habitat shall be replaced and/or rehabilitated to ensure “no-net-loss.”</p> <p>Before any ground-disturbing project activities begin in areas that contain potentially jurisdictional wetlands, the wetland delineation findings shall be documented in a detailed report and submitted to USACE for verification as part of the formal Section 404 wetland delineation process and to DTSC. For all jurisdictional areas that cannot be avoided as described above, authorization for fill of wetlands and alteration of waters of the United States shall be secured from USACE through the Section 404 permitting process before project implementation. Habitat restoration, rehabilitation, and/or replacement shall be at a location and by feasible methods agreeable to USACE and consistent with applicable county and agency policies and codes. Minimization and compensation measures adopted through any applicable permitting processes shall be implemented.</p> <p>Alternately, if USACE declines to assert jurisdiction because it determines that CERCLA Section 121(e)(1) applies, the substantive equivalent of the Section 404 permitting process shall be complied with by ensuring that the acreage of jurisdictional wetland affected is replaced on a “no-net-loss” basis in accordance with the substantive provisions of USACE regulations. Habitat restoration, rehabilitation, and/or replacement shall be at a location and by feasible methods consistent with USACE methods, and consistent with the purpose and intent of applicable county and agency policies and codes. Minimization and compensation measures adopted through any applicable permitting processes shall be implemented. In any event, a report shall be submitted to DTSC to document compliance with these mandates.</p> <p>If during the design process it is shown that complete avoidance of habitats under DFG jurisdiction (such as changes to the natural flow and/or bed and bank of a waterway) is infeasible, a Section 1602 streambed alteration agreement shall be obtained from DFG and affected habitats shall be replaced</p>				

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	<p>and/or rehabilitated. If complete avoidance of identified riparian habitat is not feasible, the acreage of riparian habitat that would be removed shall be replaced or rehabilitated on a no-net-loss basis in accordance with DFG regulations and, if applicable, as specified in the streambed alteration agreement, if needed. Habitat restoration, rehabilitation, and/or replacement shall be at a location and by methods agreeable to DFG and consistent with the purpose and intent of applicable county policies and codes, as well as those policies outlined under the respective federal agency guidance documents. Minimization and compensation measures adopted through the permitting process shall also be implemented. Restoration of any disturbed areas shall include measures to achieve “no-net-loss” of habitat functions and values existing before project implementation. These measures shall be achieved by developing and implementing a habitat restoration plan submitted to DFG, BLM, and USFWS that is agreeable to these agencies, or, alternately, through the implementation of a habitat restoration plan consistent with the substantive policies of DFG, BLM, and USFWS. The plan shall include a revegetation seed mix or plantings design, a site grading concept plan, success criteria for restoration, a monitoring plan for achieving no net loss of habitat values and functions, and an adaptive management plan.</p> <p>Alternately, if DFG declines to assert jurisdiction because it determines that CERCLA Section 121(e)(1) applies, and during the design process it is shown that complete avoidance of habitats under DFG jurisdiction (such as changes to the natural flow and/or bed and bank of a waterway) is infeasible, the substantive mandates of a streambed alteration agreement shall be implemented, and affected habitats shall be replaced and/or rehabilitated. If complete avoidance of identified riparian habitat is not feasible, the acreage of riparian habitat that would be removed shall be replaced or rehabilitated on a “no-net-loss” basis in accordance with DFG regulations and, if applicable. Habitat restoration, rehabilitation, and/or replacement shall be at a location and by methods agreeable to DFG and consistent with the purpose and intent of applicable county policies and codes, as well as those policies outlined under the respective federal agency guidance documents. Minimization and compensation measures adopted through the permitting process shall also be implemented. Restoration of any disturbed areas shall</p>				

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	include measures to achieve “no-net-loss” of habitat functions and values existing before project implementation. These measures shall be achieved by developing and implementing a habitat restoration plan developed consistent with the substantive policies of DFG, BLM and USFWS. The plan shall include a revegetation seed mix or plantings design, a site grading concept plan, success criteria for restoration, a monitoring plan for achieving no net loss of habitat values and functions, and an adaptive management plan.				
BIO-2a	<p>Disturbance of Special-Status Birds and Loss of Habitat.</p> <p>To the extent feasible, the project implementation plans shall be designed to minimize removal of habitat for special-status birds. During the design process and before ground disturbing activities (<u>except within the East Ravine as described in the Revised Addendum and unless otherwise required as noted below</u>), a qualified biologist shall coordinate with PG&E to ensure that the footprints of project elements and construction zones, staging areas, and access routes are designed to avoid direct or indirect effects on habitat and nesting habitat for other special-status species, to the extent feasible. DTSC will ensure compliance with all preconstruction and construction phase avoidance measures identified during this process and included in any design plans. Vegetation removal and other activities shall be timed to avoid the nesting season for special-status bird species that may be present. The nesting cycle for most birds in this region spans March 15 through September 30.</p> <p><i>Preconstruction Measures</i></p> <p>Preconstruction breeding season surveys shall be conducted during the general nesting period, which encompasses the period from March 15 through September 30, if the final design of the project (<u>including East Ravine investigation Sites I, K and L</u>) could result in disturbance or loss of active nests of special-status bird species. If vegetation removal or other disturbance related to project implementation is required during the nesting season, focused surveys for active nests of special-status birds shall be conducted before such activities begin. A qualified biologist shall conduct preconstruction surveys to identify active nests that could be affected. The appropriate area to be surveyed and the timing of the survey</p>	Before and during construction.	PG&E		

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	<p>may vary depending on the activity and species that could be affected. For the Yuma clapper rail, the preconstruction surveys shall specifically identify habitat within 300 feet of construction areas, in accordance with substantive policies of USFWS including those set out in USFWS protocols.</p> <p>Construction Measures Before the initiation of project elements that could result in disturbance of active nests or nesting pairs of other special-status birds, a qualified biologist shall be consulted to identify appropriate measures to minimize adverse impacts during the construction phase of the project. If deemed appropriate for the final project design because of the potential for impacts, minimization measures will include focusing construction activities that must be conducted during the nesting season to less-sensitive periods in the nesting cycle, implementing buffers around active nests of special-status birds to the extent practical and feasible to limit visual and noise disturbance, conducting worker awareness training, and conducting biological monitoring (including noise monitoring to determine if construction noise at the edge of suitable nesting habitat is elevated above 60 dBA L_{eq} or ambient levels).</p> <p>An avoidance and minimization plan for special status bird species, as defined in Table 4.3-3 and those species protected under the federal Migratory Bird Treaty Act, including the Yuma clapper rail, shall be developed and implemented in consultation with USFWS, and agreed upon by DTSC. Avoidance and impact minimization measures, such as prohibiting construction near or in sensitive bird habitat, limiting construction during breeding seasons, and requiring an on-site biological monitor, shall be included in the design plan and implemented to the extent necessary to avoid significant impacts on sensitive bird species.</p>				
BIO-2b	<p>Disturbance of Desert Tortoise and Loss of Habitat. Preconstruction Measures In areas where impacts to potential desert tortoise habitat are unavoidable, measures outlined in the Programmatic Biological Agreement (PBA) and in the USFWS letter concurring with the PBA, shall be implemented, as</p>	Before and during construction	PG&E		

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	<p>described below. To the extent feasible, project construction shall be designed to minimize removal of habitat for the desert tortoise. Before any ground-disturbing project activities begin, <u>and except within the East Ravine for which potential effects to the tortoise have been considered per the PBA</u>, a USFWS-authorized desert tortoise biologist shall identify potential desert tortoise habitat in areas that could be affected by the final project design. Through coordination with the authorized biologist, PG&E shall ensure that the footprints of project elements and construction zones, staging areas, and access routes are designed to avoid direct or indirect effects on potential desert tortoise habitat to the extent feasible. These measures include the presence of a USFWS-authorized desert tortoise biologist on-site who will examine work areas and vehicles for the presence of desert tortoises, and who will conduct preconstruction desert tortoise surveys in areas where unavoidable impacts to tortoise habitat would occur. If feasible, the preconstruction desert tortoise surveys would coincide with one of the two peak periods of desert tortoise activity (i.e., if feasible, the surveys should be conducted in either the period from April through May, or from September through October). The preconstruction surveys shall be in full accordance with the substantive requirements of USFWS protocols.</p> <p><i>Construction Measures</i> Before the initiation of project elements that could result in disturbance of desert tortoises or desert tortoise habitat, a USFWS-authorized desert tortoise biologist shall be consulted to identify appropriate measures to minimize adverse impacts. Minimization measures are likely to include micro-siting structures, pipelines, and access roads in previously disturbed areas or in areas with sparse scrub vegetation, conducting worker awareness</p>				

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BIO-2c	<p>Disturbance of Special-Status Species and Loss of Habitat Caused by Decommissioning.</p> <p>To avoid impacts on special-status species that may occur within the project area as a result of decommissioning activities, an avoidance and minimization plan shall be developed and implemented through consultation with DFG, BLM, and USFWS. These measures shall be based on surveys conducted prior to decommissioning, and during the breeding season (as previously defined in this EIR for each species or suite of species). Restoration of any disturbed areas shall include measures to achieve no net loss of habitat functions and values existing before project implementation. These measures shall be achieved by developing and implementing a habitat restoration plan submitted to DFG, BLM, and USFWS that is agreeable to these agencies. The plan shall include a revegetation seed mix or plantings design, a site grading concept plan, success criteria for restoration, a monitoring plan for achieving no net loss of habitat values and functions, and an adaptive management plan.</p>	During the design and planning of decommissioning activities and before decommissioning activities that have the potential to result in ground disturbance	PG&E		

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BIO-3a	<p>Potential Impacts to Aquatic Habitat Related to Turbidity, Erosion, Sedimentation, and Overall Water Quality during Construction of the Intake Structure.</p> <p>Hydrology & Water Quality Mitigation Measure HYDRO-1 shall be implemented in order to reduce water quality impacts related to erosion and pollutant runoff through implementation of BMPs. In addition, installing the cofferdam and dewatering a portion of the proposed intake structure site during fish screen construction may result in fish stranding. PG&E and its contractor shall coordinate with a qualified fisheries biologist to develop and implement a fish rescue plan. The fish rescue effort would be implemented during the dewatering of the area behind the cofferdam and would involve capturing those fish and returning them to suitable habitat within the river.</p> <p>The fish rescue plan shall identify and describe the following items: collection permits needed, fish capture zones, staffing, staging areas, fish collection and transport methods, species prioritization, resource agency contacts, fish handling protocols, fish relocation zones, site layout and progression of dewatering and fish rescue, and records and data. To ensure compliance, a fisheries biologist shall be present on-site during initial pumping (dewatering) activities and to oversee the fish rescue operation.</p>	During construction activities	PG&E		
BIO-3b	<p>Potential Loss or Degradation of Aquatic Habitat.</p> <p>To restore, replace, or rehabilitate habitat impacted by the intake structure, PG&E shall implement the measures described below. Unless as provided below, PG&E shall confer with DFG regarding potential disturbance to fish habitat and shall obtain a streambed alteration agreement, pursuant to Section 1602 of the California Fish and Game Code, for construction work associated with intake structure construction; PG&E shall also confer with DFG pursuant to the CESA regarding potential impacts related to the loss of habitat or other operational impacts on state-listed fish species, respectively. PG&E shall comply with all requirements of the streambed alteration agreement and any CESA permits to protect fish or fish habitat or to restore, replace, or rehabilitate any important habitat on a “no-net-</p>	Before operation of the intake structure	PG&E		

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	<p>loss” basis.</p> <p>Alternatively, if DFG declines to assert jurisdiction because it determines that CERCLA Section 121(e)(1) applies, the project proponent shall consult with DFG regarding potential disturbance to fish habitat and shall meet the substantive policies of a streambed alteration agreement and of the CESA for construction work associated with intake structure construction and operations. PG&E shall comply with all substantive requirements of the streambed alteration agreement and CESA to protect fish and fish habitat or to restore, replace, or rehabilitate any important habitat on a “no-net-loss” basis and to operate the facility in accordance with CESA to ensure no net loss of habitat function.</p> <p>Additionally, PG&E shall consult with USACE regarding the need to obtain permits under section 404 of the CWA and section 10 of the Rivers and Harbors Act. In conjunction with these permitting activities, the USACE must initiate consultation with USFWS under Section 7 of the Federal ESA regarding potential impacts of the proposed project on federally listed fish species due to the loss of habitat on federally listed fish species. PG&E shall implement any additional measures developed through the ESA Section 7 processes, or its equivalent, to ensure “no-net-loss” of habitat function.</p> <p>Alternatively, if USACE and/or USFWS decline to assert jurisdiction because it determines that CERCLA Section 121(e)(1) applies, PG&E shall confer with USFWS regarding potential disturbance to federally listed fish species and federally listed fish species habitat and shall meet the substantive mandates under Section 7 of the Federal ESA regarding potential impacts to fish or to habitat of federally listed fish species. PG&E shall implement any additional measures developed through that processes, including compliance with the substantive requirements of all of what would be permit conditions if not exempt pursuant to CERCLA, and to ensure “no-net-loss” of habitat function.</p> <p>Because the type and extent of habitat potentially affected is unknown, PG&E shall have an instream habitat typing survey conducted in the area potentially affected by the intake construction. Further, cooperation with</p>				

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	USFWS and other fisheries biologists shall determine suitable and acceptable location(s) for the intake structure(s) to avoid the spawning habitat of special-status fish species. PG&E shall avoid habitat modifications, especially to habitat that is preferred by native fishes for spawning or rearing including side channels, cobble or gravel bars, and shallow backwaters. If these habitat types cannot be avoided, any disturbed habitat will be restored or replaced to achieve “no-net-loss” of habitat types and values as described above.				
BIO-3c	<p>Potential Fish Entrainment and Impingement during Operation of the Intake Structure.</p> <p>Both screened and unscreened diversions can entrain larval life stages of fish. For example, adverse effects to early life stages of fish could occur if diversions coincide with planktonic larval life stages that occur during summer months, a period of high entrainment vulnerability. Prior to operation of the intake structure, PG&E shall consult with USFWS and DFG to determine the most vulnerable time of the year for entrainment or impingement of razorback sucker and bonytail chub eggs or larvae.</p> <p>PG&E shall install a state-of-the-art positive-barrier fish screen that would minimize fish entrainment and impingement at the intake structure. The fish screen shall be designed in accordance with DFG and the National Marine Fisheries Service criteria, with specific consideration given to minimizing harm to fish eggs and other early life stages.</p> <p>To ensure that the fish screen operates as intended and reduce the risk of impacts, long-term monitoring of the operations and maintenance of the positive-barrier screen shall be conducted. Monitoring at the onset of diversions through the intake shall include approach velocity measurements immediately after the positive-barrier screen operations begin, with fine-tuning of velocity control baffles or other modifications as necessary, to achieve uniform velocities in conformance with the screen criteria established by regulatory agencies.</p>	During design and operation of the intake structure	PG&E		

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Cultural Resources

CUL-1a	<p>During Design, Construction, O&M, and Decommissioning Implement Measures to Avoid, Minimize, or Mitigate Impacts on Cultural Resources.</p> <p>Establishment of a cultural impact mitigation program and a Corrective Measures Implementation Workplan (CMI Workplan), with specific activities stipulated for each phase of the project, will reduce the potential for impacts on historical resources within the project area, and will help preserve the values of and access to the Topock Cultural Area for local tribal users. As detailed below, measures will be implemented to avoid known resources, re-use existing disturbed areas to the extent feasible, allow for tribal input to the final design and maintain access for tribal users during design, construction, operation, and decommissioning activities, as appropriate. During construction, a Worker Education Program and regular archaeological and tribal monitoring will be implemented, and measures intended to reduce the potential for incursion by outside parties will be strengthened. <u>This measure does not apply to the activities included as part of the East Ravine Revised Addendum, Groundwater Investigation (dated December 31, 2010).</u></p> <p>CUL-1a-1: During development of the final design and the construction, operation, and decommissioning phases of the project, PG&E shall carry out and require all subcontractors to carry out all investigative, testing, and remediation activities, including all supporting operations and maintenance activities, in ways that avoid, minimize, and mitigate significant adverse effects</p>	During the design, construction, O&M, and decommissioning phases	PG&E		
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¹ “Interested Tribes” means, for purposes of this EIR and the mitigation measures contained herein, the six tribes that have substantially participated in the various administrative processes surrounding remediation of the site with DTSC, PG&E, and DOI, including throughout development of the final remedy. Interested tribes include the Chemehuevi Indian Tribe, Cocopah Indian Tribe, Colorado River Indian Tribes, Fort Mojave Indian Tribe, Fort Yuma-Quechan Indian Tribe, and Hualapai Indian Tribe.

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	<p>to historically significant cultural and historic resources, consistent with the CEQA Guidelines, and including the Topock Cultural Area, to the maximum extent feasible as determined by DTSC.</p> <p>CUL-1a-2: As part of the CMI Workplan, PG&E shall develop a written access plan to preserve tribal members' access to, and use of, the project area for religious, spiritual, or other cultural purposes. This plan will allow access to the extent PG&E has the authority to facilitate such access, and be consistent with existing laws, regulations, and agreements governing property within the project area. The access plan may place restrictions on access into certain areas, such as the Compressor Station and the existing evaporation ponds, subject to DTSC review with regard to health and safety concerns and to ensure noninterference with approved remediation activities. This access plan may be developed in coordination with the federal agencies with land management responsibilities in the project area (e.g., BLM and USFWS) in accordance with the related stipulation (General Principle I.C) contained in the Programmatic Agreement (Appendix PA). PG&E shall demonstrate a good faith effort to coordinate with Interested Tribes1 by including communication logs as part of the CMI Workplan.</p> <p>CUL-1a-3: PG&E shall enhance existing measures to prevent and reduce incursions from recreational and/or other outside users from affecting unique archeological and historically significant resources, including resources within the Topock Cultural Area, by:</p> <ol style="list-style-type: none"> a. Retaining a Qualified Cultural Resource Consultant to implement the Mitigation Monitoring and Reporting Program (MMRP) and conducting yearly 				

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	<p>inspections (or less frequently upon approval by DTSC) of identified historical resources, including inspections of the Topock Cultural Area, to determine if substantial adverse changes have occurred relative to the condition of the historical resources during the past year or prior to the implementation of the proposed project. PG&E shall offer to retain a tribal monitor at historic rates of compensation or tribal representatives designated by the Tribal Council or chairperson, if so requested, to accompany the Qualified Cultural Resources Consultant during the inspections. The Qualified Cultural Resource Consultant shall be a person who is acceptable to DTSC and who is also a qualified archaeologist with a graduate degree in archaeology, anthropology or closely related field, plus at least 3 years of full-time professional experience in general North American archaeological research and fieldwork, with expertise/experience in the Southwest preferred.</p> <p>b. Developing a site security plan as part of the CMI Workplan. The site security plan shall include, but not be limited to, instructions for PG&E personnel to inspect the project site routinely during construction and report any human-caused disturbance to project facilities and the surrounding environment to DTSC and the appropriate landowner, such as BLM, USFWS, or FMIT, as appropriate, depending on the ownership of the property involved in the incursion. Notification shall be within a specified period, as established in the site security plan for the event, and shall also be summarized as part of the periodic implementation status report, as approved by DTSC for remedy</p>				

**Table 5-1
Mitigation Monitoring and Reporting Program for the Topock Compressor Station Groundwater Remediation Project**

Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	<p>implementation. This measure does not impose any obligation on PG&E to perform law-enforcement duties on federal or private lands, but is intended to provide increased observation of potential intrusions into the project area during construction and operation of the final remedy that may impact significant cultural resources. PG&E staff, or assigned agents, should be instructed to report any outside disturbance to the environment personally observed over the course of the working day. Information shall be reported within a specific period, as established in the site security plan, to DTSC and the appropriate landowners, such as BLM, USFWS, or FMIT, depending on the ownership of the property intruded upon. The site security plan may also include the use of PG&E security cameras at major ingress/egress gates into the project site. Finally, if requested by the FMIT the plan may include the use of private security personnel to patrol the FMIT-owned parcel within the project area to prevent outside incursions.</p> <p>c. Coordinating with BLM and San Bernardino County to facilitate an outreach effort to the staff at Moabi Regional Park, requesting that they communicate to visitors the parts of the project area that are off limits to off-road vehicle usage because of health and safety concerns, public lands management plans, or landowner requests. PG&E shall make a good faith effort to involve the surrounding tribes in this outreach effort, providing Interested Tribes with the opportunity to comment on outreach materials or provide a tribal cultural resources specialist the opportunity to participate in the outreach activities. As part of this outreach</p>				

**Table 5-1
Mitigation Monitoring and Reporting Program for the Topock Compressor Station Groundwater Remediation Project**

Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	<p>effort, PG&E shall work with Park Moabi and offer to design, develop, and fund the installation of an informational kiosk within Park Moabi that informs visitors of the work being done at the project site. PG&E shall involve the tribes to the maximum extent feasible, as determined by DTSC, in the design and development of the informational kiosk.</p> <p>d. Posting signage to indicate those parts of the project area that are off limits to off-road vehicle usage due to possible health and safety concerns and to reduce potential damage to environmental resources. If agreed to by land owners and/or local, state, or federal management entities within the project area, PG&E shall work with the relevant land owner or land management entity to develop, design, and fund the installation of easily visible and clear signage. This may include coordination with BLM to install signage noting the designation of the area as an Area of Critical Environmental Concern owing to its biological and cultural resources, while ensuring that signs are placed in a way that does not draw unwanted attention to specific resources.</p> <p>CUL-1a-4: PG&E shall work with representative members of the Interested Tribes to convene and retain a multidisciplinary panel of independent scientific and engineering experts as part of a Technical Review Committee (TRC). The TRC shall be made up of not more than five multidisciplinary experts who will be on call to review project-related documents, participate in project-related meetings, and advise interested tribal members on technical matters relating to the final design and remedy. The TRC shall include only persons with</p>				

**Table 5-1
Mitigation Monitoring and Reporting Program for the Topock Compressor Station Groundwater Remediation Project**

Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	<p>technical expertise, including but not limited to geology, hydrology, water quality, engineering, paleontology, toxicology, chemistry, biology, or botany. Before July 1, 2011, PG&E shall post an open grant or Request for Qualifications (RFQ) and retain members of the TRC at rates comparable to those paid historically to tribal experts by PG&E for the remediation project. TRC members shall be selected by majority vote of one representative from each participating Interested Tribe. PG&E shall provide Interested Tribes at least 30-days notice of the meeting to select TRC members and to review TRC candidate qualifications. For the purposes of contracting, the grant may be awarded to one tribal government to manage or, alternatively, PG&E may reimburse the tribe or TRC members directly. The entirety of the monies shall be used to fund the scientific and engineering team exclusively, and shall not be used to fund other tribal government expenses or used to support legal counsel. A stipulation of the open grant shall be that the scientific and engineering team shall provide all deliverables and results to all involved tribes, despite a possible contract agreement with only one tribe or with PG&E. Upon conclusion of the construction phase of the project, the necessity and dollar value of the TRC shall be assessed by PG&E and, with the approval of DTSC, shall either be extended, reduced, or terminated under the operations and maintenance phase. An annual activity report shall be sent to DTSC for review and to ensure PG&E is in compliance.</p> <p>CUL-1a-5: Should any indigenous plants of traditional cultural significance and listed in Appendix PLA of this FEIR be identified within the project area, PG&E shall avoid, protect, and encourage the natural regeneration of the identified plants when developing the remediation</p>				

**Table 5-1
Mitigation Monitoring and Reporting Program for the Topock Compressor Station Groundwater Remediation Project**

Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	<p>design, final restoration plan, and IM-3 decommission plan. In the event that impacts on the identified plants cannot be avoided and such plants will be displaced, PG&E shall retain a qualified botanist who shall prepare a plant transplantation/monitoring plan which can be included as part of the Cultural Impact Mitigation Program (CIMP) referenced in CUL-1a-8 either by (1) transplanting such indigenous plants to an on-site location, or (2) providing a 2:1 ratio replacement to another location decided upon between PG&E and members of the Interested Tribes. Plans to transplant or replace such plants shall be approved by DTSC. In coordination with the qualified botanist, PG&E shall monitor all replanted and replacement plants for at least 3-5 years, and shall ensure at least a 75 percent survivorship during that time. This mitigation measure is not meant to replace or subsume any actions required by state or federal entities with regard to the protection of species listed as rare, threatened, or endangered.</p> <p>CUL-1a-6: All additional phone calls and alarms associated with remediation activities or facilities shall not be routed through PG&E's existing alarm system utilized at the compressor station. The notification system for remediation-related alerts and/or phone calls shall not introduce additional noise to the project area, to the maximum extent feasible, provided there is ongoing compliance with applicable safety regulations or standards of the Federal Energy Regulatory Commission, Occupational Safety and Health Administration, and other agencies. (See Mitigation Measure NOISE-3 for additional mitigation related to the Topock Cultural Area).</p> <p>CUL-1a-7: Nighttime construction-related activities shall be limited to work that cannot be disrupted or suspended until the</p>				

**Table 5-1
Mitigation Monitoring and Reporting Program for the Topock Compressor Station Groundwater Remediation Project**

Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	<p>following day, such as, but not limited to, well drilling and development or decommissioning activities.</p> <p>Lighting considerations, including the potential use of solar power for some lighting, shall be included as part of the remedial design plan to be developed with involvement of Interested Tribes and the U.S. Department of the Interior. To minimize construction and operations-related lighting impacts, the lighting in the remedial design plan shall include, at a minimum:</p> <p>(1) shrouding/shielding for portable lights needed during construction and operational activities; (2) installation of portable lights at the lowest allowable height and in the smallest number feasible to maintain adequate night lighting for safety; (3) shielding and orientation of lights such that off-site visibility of light sources, glare, and light from construction activities is minimized to the extent feasible. No additional permanent poles shall be installed for lighting. This mitigation measure is not meant to replace or subsume any actions required by the County or state or federal entities with regard to lighting required for minimum security and safety purposes.</p> <p>CUL-1a-8: Prior to commencement of construction, PG&E shall submit as part of the final Remedial Design, a CIMP developed in coordination with Interested Tribes for DTSC's review and approval. The CIMP may be developed in coordination with the federal agencies with land management responsibilities in the project area (e.g., BLM and USFWS) in accordance with the Programmatic Agreement (Appendix PA). The CIMP shall include, at a minimum and to DTSC's satisfaction, the following:</p> <p>a. Protocols for continued communication. Consistent with past practice and the communication processes previously entered into by PG&E with Interested</p>				

**Table 5-1
Mitigation Monitoring and Reporting Program for the Topock Compressor Station Groundwater Remediation Project**

Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	<p>Tribes, the company shall continue to communicate with Interested Tribes during the design, construction, operation, and decommissioning of the project. Prior to implementation of construction, PG&E shall communicate with Interested Tribes that place cultural significance on the Topock Cultural Area. Outreach efforts between the Tribes and PG&E shall be communicated by PG&E to DTSC quarterly during the design and construction phase for review and input, and annually during project operations.</p> <p>b. Protocols for the appropriate treatment of archaeological materials that may be disturbed or discovered during implementation of the final remedy, including protocols for the repatriation of significant items of cultural patrimony that may be recovered during the project, and protocols for the curation of cultural materials recovered during the project. Treatment of archaeological sites may include data recovery or capping. If data recovery is proposed, a Research Design following California Office of Historic Preservation guidelines or federal guidelines, as applicable, shall be prepared and reviewed and approved by DTSC.</p> <p>c. Protocols for the review of cultural resource-related documents throughout the design, construction, and operational phases.</p> <p>d. Protocols for the review of project design documents before the beginning of construction, including reviews of project design documents throughout the design process (e.g., Preliminary [approximately 30% completed], Intermediate</p>				

**Table 5-1
Mitigation Monitoring and Reporting Program for the Topock Compressor Station Groundwater Remediation Project**

Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	<p>[approximately 60% completed] and Pre-final design).</p> <ul style="list-style-type: none"> e. Protocols for the appropriate methods to be used to restore the environment to its preconstruction condition upon decommissioning of individual groundwater remedy facilities. f. A plan for the decommissioning and removal of the IM-3 Facility and proposed restoration of the site (to be an appendix to the CIMP). g. Protocols for the repatriation of clean soil cuttings generated during construction activities and during drilling associated with repair/replacement activities during operations and maintenance phases. The soil cuttings shall be managed in compliance with applicable laws and regulations on site. h. Protocols for the appropriate methods, consistent with Mitigation Measure NOISE-3, to reduce auditory impacts. i. Protocols for the appropriate methods, consistent with Mitigation Measures AES-1 and AES-2, to reduce visual intrusions. j. Protocols for tribal notification in advance of project-related activities that the Interested Tribes may feel have the potential to cause adverse impacts to sensitive cultural resources. k. Protocols to be followed by project personnel to accommodate, if feasible as determined by DTSC, key tribal ceremonies that involve the Topock Cultural Area. l. Provisions affording sufficient tribal monitors to observe ground-disturbing activities and/or other 				

**Table 5-1
Mitigation Monitoring and Reporting Program for the Topock Compressor Station Groundwater Remediation Project**

Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	<p>scientific surveying (e.g., biological surveys) that may occur in preparation for construction activities. Ground-disturbing activities include trenching, excavation, grading, well excavation/drilling, decommissioning of the IM-3 Facility and subsurface pipeline, or other construction-related activities.</p> <p>m. Provisions of reasonable compensation for tribal monitors consistent with historic rates.</p> <p>n. Locations requiring specific protective devices, such as temporary fencing, flagging, or other type of demarcation during construction.</p> <p>o. Protocols for the reporting of discoveries of cultural importance consistent with existing statutes and regulations.</p> <p>p. Protocols for the inspection of remediation facilities and/or staging areas throughout the construction phase.</p>				
	<p>CUL-1a-9: During selection of the design and specific locations for physical remediation facilities, PG&E shall, in communication with the Interested Tribes (and subject to their review), and to the maximum extent feasible, as determined by DTSC, give: (1) priority to previously disturbed areas for the placement of new physical improvements; and (2) priority to re-use of existing physical improvements, such as but not limited to wells and pipelines, but not including IM-3 facilities. "Disturbed" areas in this context means those areas outside of documented archaeological site boundaries that have experienced ground disturbance in the last 50 years. PG&E shall produce an aerial map of these</p>	During the design phase	PG&E		

**Table 5-1
Mitigation Monitoring and Reporting Program for the Topock Compressor Station Groundwater Remediation Project**

Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	<p>disturbed areas to guide project design, and PG&E shall make a good faith effort to provide tribes with an opportunity to review and comment on the information displayed on the map in determining “disturbed” areas.</p> <p>CUL-1a-10: PG&E shall consider the location of Loci A, B, and C of the Topock Maze during the design and approval of the physical facilities necessary for the final remedy and is prohibited from creating any direct physical impact on the Topock Maze, as it is manifested archaeologically. Through the design, PG&E shall prevent all indirect (e.g. noise, aesthetics) impacts on the Topock Maze, to the maximum extent feasible as determined by DTSC.</p>				
	<p>CUL-1a-11: PG&E shall provide an open grant for two part-time cultural resource specialist/project manager positions during the design and construction phases of the remediation project. The positions shall be filled by qualified members of an Interested Tribe as nominated by a majority vote of their Tribal Council(s) and appointed by DTSC’s project manager if more than two members are nominated. The award of the grants is for continued involvement in review of project documents and participation in project-related meetings, including TRC meetings, at rates of historic compensation. Additionally, in light of FMIT’s ownership of land in the project area and historical involvement in the environmental process, additional funding is guaranteed for one full-time FMIT position upon submission of an application by a qualified FMIT member who shall be appointed by the FMIT council, provided such funding is not duplicative of the services and funding provided by PG&E pursuant to the Settlement Agreement between PG&E and the FMIT in <i>Fort Mojave Indian</i></p>	During the design and construction phases	PG&E		

**Table 5-1
Mitigation Monitoring and Reporting Program for the Topock Compressor Station Groundwater Remediation Project**

Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	<p><i>Tribe v. Dept. of Toxic Substances Control, et al.</i>, Case No. 05CS00437 for a position with the FMIT's AhaMakav Culture Society. The payment of grant monies shall be timed to the awarded tribes' fiscal cycles so that the tribes are not forced to front funds for long periods of time. These positions shall act as cultural resources contacts and project managers for interactions between the tribes, PG&E, and DTSC to ensure coordination for review and comment of subsequent project and/or environmental documents related to the design and implementation of the groundwater remediation project to avoid, reduce, or otherwise mitigate impacts on historical resources, as defined by CEQA. This funding is separate from provisions for tribal monitor positions and shall not be used for routine tribal business or legal counsel. For review and approval, PG&E shall provide DTSC with the names of the selected grant recipients and an annual report that summarizes activities associated with the grant program. Upon the conclusion of the construction phase of the project, the necessity and dollar value of the grant program shall be assessed by PG&E and, with the approval of DTSC, shall either be extended or terminated under the operations and maintenance phase.</p>				
	<p>CUL-1a-12: PG&E shall provide sufficient opportunity, as determined by DTSC, for Interested Tribes to provide a traditional healing/cleansing ceremony (or ceremonies) before and after ground disturbing construction activities occur.</p>	During the construction phase	PG&E		
	<p>CUL-1a-13: PG&E shall, in communication with Interested Tribes, develop as part of the CMI Workplan, a worker cultural sensitivity education program. The program shall be implemented before commencement of construction and throughout construction and</p>	During the construction and operations/maintenance phase			

**Table 5-1
Mitigation Monitoring and Reporting Program for the Topock Compressor Station Groundwater Remediation Project**

Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	<p>operations as personnel are added. This program may include information provided directly by tribal entities either in written form or on video, in a manner consistent with Appendix C in the existing BLM Programmatic Agreement. The worker cultural sensitivity education program shall ensure that every person working on the project as an employee or contractor, before participating in design or outdoor activities at the project site, is informed regarding:</p> <ul style="list-style-type: none"> • the cultural significance of the Topock Cultural Area, • appropriate behavior to use within the Topock Cultural Area, • activities that are to be avoided in the Topock Cultural Area, and • consequences in the event of noncompliance. 				
CUL-1b and 1c	<p>During Design, Construction, O&M, and Decommissioning Consider the Location of Historical Resources and Implement Measures to Avoid Resources to the Extent Feasible</p> <p>The following actions will reduce the potential for impacts on identified historically significant resources (other than the Topock Cultural Area, which is separately addressed in CUL-1a) within the project area. As detailed below, these actions include consideration of the location of historical resources, preparation of a cultural resources study, and preparation of a treatment plan. Monitoring of ground-disturbing activities during project construction will further protect historically significant resources. Protective actions are also described pertaining to the discovery of any previously unidentified potentially significant cultural resources.</p> <p>CUL-1b/c-1: PG&E shall consider the locations of the identified historic resources described above (Table 4.4-3) during the design of the physical improvements necessary for the proposed project and avoid, minimize, or mitigate impacts on historical and archaeological resources to the maximum extent feasible, as determined by DTSC. The final design plans for the project will be submitted to DTSC for review and approval.</p> <p>CUL-1b/c-2: During preparation of the final design, and consistent with CUL-1a-3, PG&E shall retain a Qualified Cultural</p>	During the design phase	PG&E		

**Table 5-1
Mitigation Monitoring and Reporting Program for the Topock Compressor Station Groundwater Remediation Project**

Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	<p>Resources Consultant to prepare a cultural resources study that assesses the potential for the construction, operations, or decommissioning of specific proposed improvements to result in significant impacts on identified historically significant resources described in Impacts CUL-1b and CUL-1c. This may include a geoarchaeological investigation and/or non-destructive remote-sensing surveys of potentially disturbed areas to determine if a potential exists for buried historical and archaeological resources. “Significant impacts” as used here means the potential for construction to demolish or materially alter in an adverse manner those physical characteristics of a resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR. The study will be submitted to DTSC for review and evaluation to determine if existing mitigation measures are appropriate.</p> <p>CUL-1b/c-3: If the cultural resources study determines that the construction of physical improvements would result in significant impacts on identified historically significant resources described in Impacts CUL-1b and CUL-1c, and avoidance of the resource is not feasible, PG&E shall prepare a treatment plan that identifies measures to reduce these impacts (see above description of the CIMP) for DTSC’s review and approval. The treatment plan shall identify which criteria for listing on the CRHR contribute to the affected resource’s significance and which aspects of significance would be materially altered by construction, operations, or decommissioning and shall provide for reasonable efforts to be made to permit the resource to be preserved in place or left in an undisturbed state. Methods of accomplishing this may include capping or covering the resource with a layer of soil. To the extent that a resource cannot feasibly be</p>				

**Table 5-1
Mitigation Monitoring and Reporting Program for the Topock Compressor Station Groundwater Remediation Project**

Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	<p>preserved in place or left in an undisturbed state, excavation as mitigation shall be restricted to those parts of the resource that would be damaged or destroyed by the project. Excavation as mitigation shall not be required for a historically significant resource if the treatment plan determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource. The plan shall require communication with all Interested Tribes with regard to their perspectives and wishes for the treatment of the resources.</p>				
	<p>CUL-1b/c-4: Consistent with CUL-1a-3a above, PG&E shall retain a Qualified Cultural Resources Consultant to observe ground-disturbing activities and shall be required to request the participation of tribal monitors during those activities, including steps necessary during operations and decommissioning activities to ensure that historically significant resources are avoided to the maximum extent feasible, as determined by DTSC, during actual construction (see the description of the CMI Workplan, above). The Qualified Cultural Resources Consultant shall provide training to construction personnel on the locations of identified resources, values associated with the identified resources, responsibility for reporting suspected historic resources, and procedures for suspension of work in the immediate vicinity of the discovery, and shall use exclusionary fencing, flagging, or other appropriate physical barriers to mark the boundaries of identified resources. The Qualified Cultural Resources Consultant shall invite participation from Interested Tribal members to participate in the training.</p> <p>In the event that previously unidentified potentially significant cultural resources are discovered during</p>	<p>During the construction phase</p>	<p>PG&E</p>		

**Table 5-1
Mitigation Monitoring and Reporting Program for the Topock Compressor Station Groundwater Remediation Project**

Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	<p>ground-disturbing activities, the Qualified Cultural Resources Consultant shall have the authority to divert or temporarily halt ground-disturbing activities in the area of discovery to allow evaluation of the potentially significant cultural resources. If such discoveries occur on land managed by a federal agency, Stipulation IX (Discoveries) of the Programmatic Agreement shall apply and are deemed adequate by DTSC. If a discovery occurs on other lands within the project area, the Qualified Cultural Resources Consultant shall contact the PG&E and DTSC project managers at the time of discovery and, in consultation with DTSC and tribal monitors, shall evaluate the resource before construction activities will be allowed to resume in the affected area. For significant cultural resources, and before construction activities are allowed to resume in the affected area, the resource(s) shall be recovered with coordination of the tribal monitors and DTSC. Recovery may include a Research Design and/or Data Recovery Program submitted to DTSC for review and approval. The Qualified Cultural Resources Consultant (and tribal monitors) shall determine the amount of material to be recovered for an adequate sample for analysis or data recovery. Any concerns or recommendations regarding the ground-disturbing activities or the handling of cultural resources shall be directed to the Qualified Cultural Resources Consultant or PG&E's site supervisor.</p>				
CUL-2	<p>During Project Design Consider the Location of Unique Archaeological Resources and Avoid Resources to the Maximum extent Feasible. Cultural resources that qualify as unique archaeological sites in the project area would probably also meet one or more of the criteria for historical resources and would be subject to Mitigation Measures CUL-1b/c-2 and CUL-1b/c-3. The mitigation measures under this identified impact are the</p>	Before completion of the final project design, during design of the proposed project and prior to ground-disturbing activities	PG&E		

**Table 5-1
Mitigation Monitoring and Reporting Program for the Topock Compressor Station Groundwater Remediation Project**

Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	<p>same as listed for Impact CUL-1b and CUL-1c.</p> <p>These mitigation measures would reduce the potential for impacts on unique archaeological resources.</p>				
CUL-3	<p>Conduct Survey and Construction Monitoring. A paleontological investigation, including a detailed survey of the project area by a qualified paleontologist, shall be conducted to refine the potential impacts on unique paleontological resources within the final design area and determine whether preconstruction recovery of sensitive resources and/or construction monitoring would be warranted. If construction monitoring is determined to be warranted, ground-altering activity would be monitored by a qualified paleontologist to assess, document, and recover unique fossils. Monitoring shall include the inspection of exposed surfaces and microscopic examination of matrix in potential fossil bearing formations. In the event microfossils are discovered, the monitor shall collect matrix for processing. In the event paleontological resources are encountered during earthmoving activities, recovered specimens shall be prepared by the paleontologist to a point of identification and permanent preservation. PG&E shall retain a Qualified Paleontologist to observe ground-disturbing activities where determined necessary based on the results of the paleontological investigation and shall be required to request the participation of tribal monitors during those activities, including steps necessary during operations and decommissioning activities to ensure that historically significant resources are avoided to the maximum extent feasible, as determined by DTSC, during actual construction (see above description of the CMI Workplan). Paleontological resources of scientific value shall be identified and curated into an established, accredited, professional museum repository in the region with permanent retrievable paleontological storage. <u>This measure does not apply to the activities included as part of the East Ravine Revised Addendum, Groundwater Investigation.</u></p>	Before and during construction	PG&E		

**Table 5-1
Mitigation Monitoring and Reporting Program for the Topock Compressor Station Groundwater Remediation Project**

Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
CUL-4	<p>With Discovery of Human Remains or Burials Suspend Work, Protect Remains, and Comply with Local, State, and Federal Laws Regarding Discoveries During Ground-Disturbing Activities. Ground-disturbing activities may disturb as-yet undiscovered human remains or Native American burials and associated grave goods. PG&E shall retain a Qualified Cultural Resource Consultant and request designated tribal monitor(s) to train construction personnel in the identification of human remains so that they may aid in the identification of such resources (see above description of the CIMP). A Qualified Cultural Resource Consultant and tribal monitor(s) shall be in place to adequately oversee all ground-disturbing activities. In the event human remains are uncovered over the course of project construction, operation and maintenance, and/or decommissioning activities, the following procedures shall be followed to ensure compliance with all applicable local, state, and federal laws.</p> <p>f) The construction contractor shall immediately suspend work within the vicinity of the discovery and determine if the remains discovered are human or nonhuman. This determination shall be made by the Qualified Cultural Resources Consultant, a qualified archaeologist and/or physical anthropologist with expert skill in the identification of human osteological (bone) remains.</p> <p>g) The Qualified Cultural Resources Consultant (and tribal monitor), or construction contractor, shall protect discovered human remains and/or burial goods remaining in the ground from additional disturbance.</p> <p>h) The Qualified Cultural Resources Consultant, archaeologist, or construction site supervisor shall contact the San Bernardino County Coroner, and the PG&E and DTSC project managers immediately. In California, all subsequent action shall conform to the protocols established in the Health and Safety Code and regulations. In Arizona, the Qualified Cultural Resources Consultant or PG&E construction site supervisor will follow Arizona laws and the implementing regulations. Human remains found on federal land would require the notification of the BLM Havasu City field office and compliance with</p>	In concert with ground-disturbing activities throughout the remediation process	PG&E		

**Table 5-1
Mitigation Monitoring and Reporting Program for the Topock Compressor Station Groundwater Remediation Project**

Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	<p>applicable federal laws and regulations, including the Native American Graves Protection and Repatriation Act if the remains are determined to be of Native American origin. The Qualified Cultural Resources Consultant shall coordinate the interaction between Interested Tribes, PG&E, the County, and DTSC to determine proper treatment and disposition of any remains.</p> <p>i) The San Bernardino County Coroner will determine if the remains are of recent origin and if an investigation of the cause of death is required (California Health and Safety Code Section 7050.5). If the coroner determines that the human remains are not Native American and not evidence of a crime, project personnel shall coordinate with the Qualified Cultural Resources Consultant (s) to develop an appropriate treatment plan. This may include contacting the next-of-kin to solicit input on subsequent disposition of the remains. If there is no next-of-kin, or recommendations by the next-of-kin are considered unacceptable by the landowner, the landowner will reinter the remains with appropriate dignity in a location outside the project area and where they would be unlikely to be disturbed in the future.</p> <p>j) In the event that the San Bernardino County Coroner determines that the human remains are Native American and not evidence of a crime, project personnel shall contact the NAHC so that a most likely descendent (MLD) can be identified as required under California Public Resources Code Section 5097.98.</p> <p>k) The MLD (s) shall inspect the area in which the human remains were found and provide treatment recommendations to the landowner and PG&E site manager in accordance with the provisions of PRC Section 5097.98. The treatment may include reburial, scientific removal of the discovered human remains and relinquishment to the MLD(s), nondestructive analysis of human remains and/or other culturally appropriate treatment. If the MLD(s) so requests, the landowner would reinter the remains with the appropriate dignity in a location</p>				

**Table 5-1
Mitigation Monitoring and Reporting Program for the Topock Compressor Station Groundwater Remediation Project**

Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	<p>outside the area of disturbance in a location unlikely to be disturbed in the future.</p> <p>1) To the maximum extent feasible, Mitigation Measure CUL-4 shall be implemented in a manner that is consistent with mitigation required by local, state, and federal requirements.</p>				
Geology & Soils					
GEO-1a	<p>Construction, Operation and Maintenance, and Decommissioning Impacts Related to Erosion of Soils.</p> <p>a) A DTSC-approved grading and erosion control plan, prepared by a California Registered Civil Engineer, shall be completed prior to implementation of any grading in areas of the site where there is a potential for substantial erosion or loss of top soils. The plan shall outline specific procedures for controlling erosion or loss of topsoil during construction, operation and maintenance, and decommissioning.</p> <p>b) To ensure soils do not directly or indirectly discharge sediments into surface waters as a result of construction, operation and maintenance, or decommission activities, PG&E shall develop a SWPPP as discussed in mitigation measure HYDRO-1 of the “Hydrology and Water Quality” section of this EIR. The SWPPP shall identify best management practices (BMPs) that would be used to protect stormwater runoff and minimize erosion during construction. PG&E shall prepare plans to control erosion and sediment, prepare preliminary and final grading plans, and shall prepare plans to control urban runoff from the project site during construction, consistent with the substantive requirements of the San Bernardino County Building</p>	<p>Before any ground disturbing activities begin and during project-related ground disturbing activities, <u>except activities included as part of the East Ravine Revised Addendum Groundwater Investigation.</u></p>	PG&E		

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	<p>and Land Use Services Department for erosion control.</p> <p>c) During road preparation activities, loose sediment shall be uniformly compacted consistent with the substantive San Bernardino County Building and Land Use Services Department requirements to aid in reducing wind erosion. Ongoing road maintenance including visual inspection to identify areas of erosion and performing localized road repair and regrading, installation and maintenance of erosion control features such as berms, silt fences, or straw wattles, and grading for road smoothness shall be performed as needed to reduce potential for erosion.</p> <p>d) Regarding the potential for contaminated soils to be eroded and contribute contamination into receiving waters, Mitigation Measures GEO-2 and HAZ-2 shall be implemented. Mitigation Measure GEO-2 provides the provisions for mitigating erosion through BMPs which shall be implemented. Mitigation Measure HAZ-2 provides the provisions for safe work practices and handling of contaminated soils as investigation derived wastes.</p>				
GEO-1b	<p>Construction, Operation and Maintenance, and Decommissioning Impacts Related to Differential Compaction of Soils.</p> <p>a) BMPs shall be implemented during construction, operation and maintenance, and decommissioning activities to minimize impacts on the affected areas. Such BMPs could include, but would not be limited to, the following: uniform compaction of roadways created for accessing the project area as per San Bernardino County Building and Land Use Services Department requirements, returning areas adversely affected by differential compaction to preexisting conditions when these areas are no longer needed, and continuing maintenance of access roads, wellhead areas, and the treatment facility areas.</p> <p>b) Work area footprints shall be minimized to the greatest extent feasible to limit the areas exposed to differential compaction. Where possible, existing unpaved access roads and staging/working areas shall be</p>	During the construction, operation and maintenance, and decommissioning activities	PG&E		

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	<p>reused and maintained for different stages of the construction. New graded areas for staging or for access roads shall be compacted to a uniform specification, typically on the order of 90 to 95% compaction and consistent with substantive San Bernardino County Building and Land Use Services Department requirements to reduce differential compaction and subsequent erosion of site soils.</p> <p>c) After the completion of the operation and maintenance phase, the disturbed areas which result in increased potential for compaction shall be returned to their respective preexisting condition by regrading consistent with the preconstruction slopes as documented through surveys that may include topographic surveys or photo surveys. The areas will be returned to the surrounding natural surface topography and compacted consistent with unaltered areas near the access roads or staging areas in question. The habitat restoration plan outlined in mitigation measure BIO-1 shall include restoration of native vegetation or other erosion control measures where revegetation would be infeasible or inadequate, for purposes of soil stabilization and erosion control of the project area.</p>				
Hazardous Materials					
HAZ-1a	<p>Spills or Releases of Contaminants during Operation and Maintenance Activities.</p> <p>a) PG&E shall store, handle, and transport hazardous material in compliance with applicable local, state, and federal laws.</p> <p>b) All chemical storage and loading areas shall be equipped with proper containment and spill response equipment. BMPs to be implemented may include, but are not limited to, use of secondary containment in mixing and storage areas; availability of spill kits and spill containment booms, and appropriate storage containers for containment of the materials generated during the spill response.</p> <p>c) A project-specific HMBP, chemical standard operating procedure (SOP) protocols and contingency plans shall be developed to ensure</p>	During operation and maintenance activities	PG&E		

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	that proper response procedures would be implemented in the event of spills or releases. Specifically, the HMBP and SOPs shall describe the procedures for properly storing and handling fuel on-site, the required equipment and procedures for spill containment, required personal protective equipment, and the measures to be used to reduce the likelihood of releases or spills during fueling or vehicle maintenance activities. BMPs to be implemented may include, but are not limited to, use of secondary containment in mixing and storage areas; availability of spill kits and spill containment booms, and appropriate storage containers for containment of the materials generated during the spill response. The field manager in charge of operations and maintenance activities shall be responsible for ensuring that these procedures are followed at all times.				
HAZ-1b	<p>Spill or Release of Contaminants during Construction and Decommissioning Activities.</p> <p>a) Fueling areas and maintenance areas would be supplied with proper secondary containment and spill response equipment.</p> <p>b) PG&E shall develop fueling SOP protocols and a contingency plan that would be implemented at all fueling areas on-site. The SOPs shall describe the procedures for properly storing and handling fuel on-site, the required equipment and procedures for spill containment, required PPE, and the measures to be used to reduce the likelihood of releases or spills during fueling or vehicle maintenance activities. Potential measures include but are not limited to, fuel storage in bermed areas, performing vehicle maintenance in paved and bermed areas, and availability of spill kits for containment and cleanup of petroleum releases. The field manager in charge of construction and decommissioning activities shall be responsible for ensuring that these procedures are followed at all times.</p> <p>c) PG&E shall comply with local, state, and federal regulations related to the bulk storage and management of fuels.</p>	During construction and decommissioning activities	PG&E		

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Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
HAZ-2	<p>Reasonably Foreseeable Releases of Chemicals from Excavated or Disturbed Soil.</p> <p>Before initiating ground-disturbing operations, a health and safety plan shall be developed and implemented by qualified environmental professionals to ensure health and safety precautions are being met. It is not possible to prepare the health and safety plan at this stage of the planning process because final construction plans and other design documents have not been finalized in sufficient detail. However, at a minimum, the health and safety plan shall include procedures to mitigate potential hazards, and such procedures shall include the use of PPE, measures that provide protection from physical hazards, measures that provide protection from chemical hazards that may be present at the site, decontamination procedures, and worker and health and safety monitoring criteria to be implemented during construction. The worker health and safety plan shall include protective measures and PPE that are specific to the conditions of concern and meet the requirements of the U.S. Occupational Safety and Health Administration's (OSHA's) construction safety requirements and Hazardous Waste Operations and Emergency Response Standard (29 CFR 1910.120). In accordance with OSHA requirements, appropriate training and recordkeeping shall also be a part of the health and safety program. The worker health and safety plan shall be certified by a Certified Industrial Hygienist in accordance with OSHA regulations. The worker health and safety plan shall be explained to the construction workers and all workers shall be required to sign the plan, which will be kept on the construction site at all times.</p> <p>Worker safety training shall occur prior to initiation of ground disturbing activities. Training shall include the review of all health and safety measures and procedures. All workers and engineering inspectors at the site shall provide written acknowledgement that the soils management plan (discussed below), worker health and safety plan, and community health and safety plan were reviewed and training was received prior to commencement of construction activities.</p> <p>The following are specific elements and directives that shall be included in</p>	Before commencement of any ground disturbing activities and during construction, operation and maintenance, and decommissioning activities that could have potential to disturb the ground surface	PG&E		

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	<p>the health and safety plan and implemented by PG&E during construction, operation and maintenance, and decommissioning of this project:</p> <p>a. Vehicles traveling on unpaved roadways or surfaces would be directed to avoid traveling in areas where contaminated soils are known to be present; vehicle speeds shall be controlled (e.g., limited to 15 mph or slower) to limit generation of dust; measures, such as wetting of surfaces, will be employed to prevent dust generation by vehicular traffic or other dust-generating work activities.</p> <p>b. Pre-mobilization planning shall occur during which the likelihood of encountering contaminated soils shall be reviewed along with the HMBP, site-specific health and safety plan, and SOPs so that the procedures are followed and the contingencies for handling contaminated soils are in-place prior to implementing the field operations.</p> <p>c. Should evidence of contaminated soil be identified during ground disturbing activities (e.g., noxious odors, discolored soil), work in this area will immediately cease until soil samples can be collected and analyzed for the presence of contaminants by the site supervisor or the site safety officer. Contaminated soil shall be managed and disposed of in accordance with a project-specific health and safety plan and soil management plan. The health and safety plan and soil management plan shall be approved by DTSC before beginning any ground disturbing activities. While the project is exempt from the requirements of the San Bernardino County Division of Environmental Health, the health and safety plan and soil management plan shall be prepared in general accordance with the substantive requirements of this agency.</p> <p>d. In the event that drilling sites must be located within areas of suspected soil contamination, the appropriate PPE shall be worn by all personnel working in these areas and methods specified in the health and safety plan used to control the generation of dust. When working in these areas, personnel shall be required to follow all guidance presented in the site-specific health and safety plan and soil</p>				

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Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	<p>management plan. The site-specific health and safety plan shall include provisions for site control such as, but not limited to, delineation of the exclusion, contaminant reduction and support zones for each work area, decontamination procedures, and procedures for the handling of contaminated soils and other investigation derived wastes. Soil that is excavated shall be loaded directly into containers such as roll-off bins; dust suppression methods shall be used prior to and during loading of soils into the bins. Suspected contaminated soils shall be segregated from suspected uncontaminated soils.</p> <p>e. Personnel working at the site shall be trained in Hazardous Waste Operations.</p> <p>f. All soil excavated and placed in roll-off bins or trucks for transportation off-site shall be covered with a tarp or rigid closure before transporting, and personnel working in the area shall be positioned upwind of the loading location.</p>				
Hydrology and Water Quality					
HYDRO-1	<p>Exceedance of Water Quality Standards. The project shall implement BMPs to meet the substantive criteria of NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities Order No. 2009-0009-DWQ NPDES No. CAS000002 (General Permit) (SWRCB 2009) as well as all other applicable federal, state, and local permit and regulatory requirements, even if a permit is not required pursuant to CERCLA, for purposes of ensuring the protection of receiving water quality. As such, a BMP plan shall be prepared and implemented for the project prior to construction and decommissioning phase activities.</p> <p>Impacts on water quality from pollutants, including soils from erosion, shall be controlled through use of the following types of BMPs, which shall be incorporated into the appropriate project-specific BMP plan. The General Permit requirements include specific BMPs as well as numeric effluent levels (NELs) and numeric action levels (NALs) to achieve the water quality</p>	Before and during activities in the project area	PG&E		

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				Action	Date Completed
	<p>standards (SWRCB 2009:3). Types of BMPs cited in the General Permit (SWRCB 2009:Attachment A:7) include:</p> <ul style="list-style-type: none"> a) Scheduling of Activities; b) Prohibitions of Practices; c) Maintenance Procedures; d) Other Management Practices to Prevent or Reduce Discharge of Pollutants to Waters of the United States; e) Treatment Requirements; and f) Operating Procedures and Practice to Control Site Runoff, Spillage or Leaks, Sludge or Waste Disposal, or Drainage from Raw Materials Storage. <p>Visual inspections and monitoring and sampling are required under the General Permit to evaluate the effectiveness of the BMPs and to determine whether modifying BMPs or implementing additional BMPs is required. The BMP designations cited below are based on those used by the <i>California Stormwater Quality Association Construction BMP Handbook</i> (California Stormwater Quality Association 2003), and are consistent with the types of BMPs referenced in the General Permit:</p> <ul style="list-style-type: none"> g) Scheduling (SS-1): Proper scheduling assists in identifying ways to minimize disturbed areas, which allows for a reduction in the active project area requiring protection and also minimizes the length of time disturbed soils are exposed to erosive processes. h) Preservation of Existing Vegetation (SS-2): Preserving existing vegetation to the maximum extent practicable facilitates protection of surfaces from erosion and can also help to control sediments. Sensitive areas should also be clearly identified and protected. i) Hydraulic Mulch (SS-3), Straw Mulch (SS-6), and Wood Mulching (SS-8): Using various mulches is a method for temporarily stabilizing soil and can be used on surfaces with little or no slope. j) Geotextiles, Plastic Covers, and Erosion Control Blankets/Mats (SS-7): 				

**Table 5-1
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	<p>These erosion control methods can be used on flat or, usually, sloped surfaces, channels, and stockpiles.</p> <p>k) Stabilized Construction Entrance/Exit (TC-1): A graveled area or pad located at points where vehicles enter and leave a construction site can be built. This BMP provides a buffer area where vehicles can drop their mud and sediment to avoid transporting it onto public roads, to control erosion from surface runoff, and to help control dust.</p> <p>l) Runoff Control Measures (SS-9, SS-10, and SC-10): These include graded surfaces to redirect sheet flow, diversion dikes or berms that force sheet flow around a protected area, and stormwater conveyances (swales, channels, gutters, drains, sewers) that intercept, collect, and redirect runoff. Diversions can be either temporary or permanent. Temporary diversions include excavation of a channel along with placement of the spoil in a dike on the downgradient side of the channel, and placement of gravel in a ridge below an excavated swale. Permanent diversions are used to divide a site into specific drainage areas, should be sized to capture and carry a specific magnitude of storm event, and should be constructed of more permanent materials. A water bar is a specific kind of runoff diversion that is constructed diagonally at intervals across a linear sloping surface such as a road or right-of-way that is subject to erosion. Water bars are meant to interrupt accumulation of erosive volumes of water through their periodic placement down the slope, and divert the resulting segments of flow into adjacent undisturbed areas for dissipation.</p> <p>m) Silt Fence (SC-1): A temporary sediment barrier consisting of fabric is designed to retain sediment from small disturbed areas by reducing the velocity of sheet flows.</p> <p>n) Gravel Bag Berm (SC-6) and Sand/Gravel Bag Barrier (SC-8): A temporary sediment barrier consisting of gravel-filled fabric bags is designed to retain sediment from small disturbed areas by reducing the velocity of sheet flows.</p> <p>o) Desilting Basin (SC-2) and Sediment Trap (SC-3): Constructing</p>				

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	<p>temporary detention structures facilitates the removal of sediment from waters. The devices provide time for sediment particles to settle out of the water before runoff is discharged.</p> <p>Secondary concerns include potential pollutants from inappropriate material storage and handling procedures and nonstormwater discharges. These will be addressed through the following types of BMPs, which shall be incorporated into the stormwater BMP plan:</p> <p>p) Material Delivery and Storage (WM-1): Provide covered storage for materials, especially toxic or hazardous materials, to prevent exposure to stormwater. Store and transfer toxic or hazardous materials on impervious surfaces that will provide secondary containment for spills. Park vehicles and equipment used for material delivery and storage, as well as contractor vehicles, in designated areas.</p> <p>q) Spill Prevention and Control (WM-4): Ensure that spills and releases of materials are cleaned up immediately and thoroughly. Ensure that appropriate spill response equipment, preferably spill kits preloaded with absorbents in an overpack drum, is provided at convenient locations throughout the site. Spent absorbent material must be managed and disposed of in accordance with applicable regulations. In particular, absorbents used to clean up spills of hazardous materials or waste must be managed as hazardous waste unless characterized as nonhazardous.</p> <p>r) Solid Waste Management (WM-5): Provide a sufficient number of conveniently located trash and scrap receptacles to promote proper disposal of solid wastes. Ensure that the receptacles are provided with lids or covers to prevent windblown litter.</p> <p>s) Hazardous Waste Management (WM-6): Provide a sufficient number of proper receptacles to promote proper disposal of hazardous wastes.</p> <p>t) Concrete Waste Management (WM-8): Dispose of excess concrete in specific concrete washout facilities.</p> <p>u) Sanitary/Septic Waste Management (WM-9): Locate sanitary and septic</p>				

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Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
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	<p>waste facilities away from drainage courses and traffic areas. Maintain the facilities regularly.</p> <p>v) Vehicle and Equipment Cleaning (NS-8): Clean vehicles and equipment that regularly enter and leave the construction site.</p> <p>w) Vehicle and Equipment Fueling (NS-9): Fuel vehicles and equipment off-site whenever possible. If off-site fueling is not practical, establish a designated on-site fueling area with proper containment and spill cleanup materials.</p> <p>x) Vehicle and Equipment Maintenance (NS-10): Use off-site maintenance facilities whenever possible. Any on-site maintenance areas must be protected from stormwater runoff and on-site flooding.</p> <p>In addition to BMPs implemented to avoid or reduce impacts from the construction and decommissioning phases, BMPs shall also be implemented to avoid or reduce impacts from the operations and maintenance phases. To address potential violation of water quality standards caused by insufficient treatment, system failure at concentrations in excess of water quality standards, proper design shall include contingency measures such as safeguards to shut down the extraction wells in case of pipeline failure or malfunction. In addition, operation of the proposed project will be governed by and follow an operations and maintenance plan.</p> <p>PG&E will comply with all applicable water quality standards, the General Permit, and any SWRCB or RWQCB resolutions identified as ARAR, as well as a corrective action monitoring program. Under the corrective action monitoring program, data will be collected to measure performance of the remedy, compliance with standards, and progress of the remedial action as a part of the project description. In addition, the project will be operated to continually assess performance issues and to modify the type, method, and configuration of the treatment delivery systems to enhance performance of the remedy to attain the cleanup goals and to respond to site conditions and performance issues as described in the project</p>				

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	<p>description.</p> <p>A SWPPP will also be prepared for the proposed project, which will contain BMPs related to industrial activities (industrial SWPPP). The BMPs are designed to reduce pollutants in discharges that may affect receiving water quality during operations and maintenance of the proposed project. As noted above, BMP designations are based on those used by the <i>California Stormwater Quality Association Construction BMP Handbook</i> (California Stormwater Quality Association 2003) and those referenced in the General Permit. The SWPPP will incorporate BMPs such as the following:</p> <p>y) Good Housekeeping: Maintain facility in a clean manner and train facility personnel to contribute to a safe, clean, and orderly environment by properly disposing of trash in designated containers, storing materials in appropriate locations, and keeping equipment clean and in good working condition.</p> <p>z) Preventative Maintenance: Prevent or minimize release of pollutants. Develop Standard Operating Procedures for operation and maintenance of facility components and train employees to follow the procedures.</p> <p>aa) Non-Stormwater Discharges (SC-10): Ensure that used oil, used antifreeze, and hazardous chemical recycling programs are being implemented. Conduct regular inspections of high priority areas.</p> <p>bb) Spill Prevention, Control, and Cleanup (SC-11): Store materials properly to prevent spills from entering the storm drain system or surface waters. Ensure that spill cleanup materials are located on-site and are easily accessible. Clean up leaks and spills immediately using proper absorbent materials. Absorbents used to clean up hazardous materials must be disposed of as hazardous waste. Educate employees about spill prevention and cleanup.</p> <p>cc) Vehicle and Equipment Fueling (SC-20): Maintain clean fuel-dispensing areas using dry cleanup methods, such as sweeping or using rags and absorbents for leaks and spills. Cover the fueling area to prevent contact with stormwater. Train personnel in pollution</p>				

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Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
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	<p>prevention, focusing on containment of spills and leaks.</p> <p>dd) Outdoor Loading/Unloading (SC-30): Load and unload chemicals during dry weather, if possible, and load and unload in designated areas. Check equipment regularly for leaks.</p> <p>ee) Outdoor Liquid Container Storage (SC-31): Cover the storage area with a roof and provide secondary containment. Inspect storage areas regularly for leaks or spills.</p> <p>ff) Outdoor Equipment Operations (SC-32): Perform activities during dry weather, cover the work area with a roof, and use secondary containment. Train employees in proper techniques for spill containment and cleanup.</p> <p>gg) Waste Handling and Disposal (SC-34): Cover storage containers with leak-proof lids, check for leaks weekly, and clean storage areas regularly. Ensure that wastes are disposed of properly.</p> <p>hh) Tank Design System: Ensure that tank systems have sufficient strength to avoid collapse, rupture, or failure and that they are protected against physical damage and excessive stress. Provide adequate secondary containment.</p> <p>In conformance with the substantive requirements of General Permit (Order No. 2009-0009-DWQ, a monitoring and reporting program will be implemented to assess the effectiveness of BMPs and to modify BMPs and revise the SWPPP, if necessary, to continue to reduce pollutants and impacts on receiving waters. The monitoring program shall include the following minimum elements as per the General Permit:</p> <p>ii) quarterly, nonstormwater visual inspections,</p> <p>jj) storm-related visual inspections within 2 business days of a qualifying rain event (producing precipitation of one-half inch or more of discharge),</p> <p>kk) visual inspection after a storm event,</p> <p>ll) monitoring of nonvisual pollutants based on the calculated risk level for the project, with Risk Level 2 and 3 requiring a minimum of three</p>				

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	<p>samples per day during qualifying rain events (SWRCB 2009:Tables 5 and 6, 22–27), and</p> <p>mm) monitoring and reporting for linear projects as per Attachment A of the General Permit</p> <p>Results of this monitoring shall be reported annually to DTSC and to the Storm Water Multi-Application Reporting and Tracking System (SMARTS). The annual report shall include a summary and evaluation of all sampling and analysis results, original laboratory reports, and chain of custody forms; a summary of all corrective actions taken during the compliance year; and identification of any compliance activities or corrective actions that were not implemented.</p> <p>NEL Violation Reports and/or NAL Violation Reports are required for Risk Level 3 and linear underground/overhead project (LUP) Type 3 Discharges. Should the project meet these criteria, the respective reports shall be submitted within 5 days of the end of the storm event, as per General Permit requirements, and provide the required information identified (SWRCB 2009:26–27 and Attachment A).</p> <p>The implementation of stormwater plans shall include an education component to train workers on water quality concerns and proper BMP implementation, maintenance, and repair, in addition to stormwater management program training on the construction BMP plan and industrial SWPPP.</p>				
HYDRO-2	<p>Exceedance of Water Quality Standards and/or Waste Discharge Requirements.</p> <p>Implement Mitigation Measure HYDRO-1. Implementation of appropriate BMPs defined in Mitigation Measure HYDRO-1 would minimize impacts on water quality by controlling erosion and siltation. Consequently, any impacts associated with erosion and siltation resulting from alterations of drainage and hydrology and water quality during construction, operation and maintenance, and decommissioning.</p>	During construction, operation and maintenance, and decommissioning	PG&E		

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HYDRO-3	<p>Exceedance of Water Quality Standards and/or Waste Discharge Requirements. Implement Mitigation Measure HYDRO-1. Mitigation Measure HYDRO-1 shall be implemented. Implementation of appropriate BMPs defined in Mitigation Measure HYDRO-1 would minimize impacts on water quality by controlling potential pollutants, including sediment, and runoff discharges from the project area. Consequently, any impacts associated with pollutants resulting from alterations of drainage and water quality during construction, operation and maintenance, and decommissioning.</p>	During construction, operation and maintenance, and decommissioning	PG&E		
Noise					
NOISE-1	<p>Short-Term Groundborne Noise and Vibration Levels Caused by Construction Activities near Sensitive Receptors. a) Construct new wells a minimum of 45 feet from vibration-sensitive receptors. Avoid constructing wells within 30 feet of vibration-sensitive land uses located in California and 275 feet of vibration-sensitive land uses located in Arizona; b) A disturbance coordinator will be designated by the project applicant, which will post contact information in a conspicuous location near the entrance so that it is clearly visible to nearby receivers most likely to be disturbed. The coordinator will manage complaints resulting from the construction vibration. Reoccurring disturbances will be evaluated by a qualified acoustical consultant retained by the project applicant to ensure compliance with applicable standards. The disturbance coordinator will contact nearby vibration-sensitive receptors, advising them of the construction schedule.</p>	Upon commencement of construction activities being performed in proximity to vibration-sensitive receptors	PG&E		

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NOISE-2	<p>Project-Generated Construction-Related Noise Levels.</p> <p>a) Construction equipment shall be properly maintained per manufacturer specifications and fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All impact tools shall be shrouded or shielded, and all intake and exhaust ports on power equipment shall be muffled or shielded.</p> <p>b) Construction equipment shall not idle for extended periods of time (more than 15 minutes) when not being utilized during construction activities.</p> <p>c) Construction activities shall include the use of berms, stockpiles, dumpsters, and or bins to shield the nearest noise-sensitive receptor adjacent to construction activities to within acceptable nontransportation noise level standards. When construction activities are conducted within the distances outlined above (i.e., 1,850 feet and 5,830 feet from California receptors and 330 feet and 735 feet from Arizona receptors for daytime and nighttime noise, respectively) relative to noise-sensitive uses in the project area, noise measurements shall be conducted by a qualified acoustical consultant at the nearest noise-sensitive land use relative to the construction activities with a sound level meter that meets the standards of the American National Standards Institute (ANSI Section S14 1979, Type 1 of Type 2) to ensure that construction noise associated with the project component complies with applicable daytime and nighttime noise standards. If noise levels are still determined to exceed noise standards, temporary barriers shall be erected as close to the construction activities as feasible, breaking the line of sight between the source and receptor where noise levels exceed applicable standards. All acoustical barriers shall be constructed with material having a minimum surface weight of 2 pounds per square foot or greater and a demonstrated Sound Transmission Class (STC) rating of 25 or greater as defined by the American Society for Testing and Materials' Test Method E90. Placement, orientation, size, and density of acoustical barriers shall be</p>	During construction activities being performed within 1,850 feet of noise-sensitive receptors to the east	PG&E		

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	<p>specified by a qualified acoustical consultant.</p> <p>d) A disturbance coordinator will be designated by the project applicant, which will post contact information in a conspicuous location near construction areas so that it is clearly visible to nearby receivers most likely to be disturbed. In addition, mailing of the same information will be sent to nearby receptors and all tribes. The coordinator will manage complaints resulting from the construction noise. Reoccurring disturbances will be evaluated by a qualified acoustical consultant retained by the project applicant to ensure compliance with applicable standards. The disturbance coordinator will contact nearby noise-sensitive receptors, advising them of the construction schedule.</p>				
NOISE-3	<p>Land Use Compatibility of Future Project Noise Levels with Places of Worship and the Topock Cultural Area. Provided that the proposed project would be required to achieve the normally acceptable exterior noise level standard for places of worship, the following mitigation measure shall be incorporated in the project design:</p> <p>a) Implement all of the mitigation measures outlined for Impact NOISE-1 and Impact NOISE-2;</p> <p>b) Upon completion of detailed project design, the determination of remediation activities and the schedule established to achieve these activities shall be communicated to Native American tribes. PG&E shall maintain a liaison with requesting Tribes to alert them to project activities that would generate new noise in the Topock Cultural Area on at least an annual basis.</p>	<p>Prior to the commencement of construction activities being performed and on at least an annual basis</p>	<p>PG&E</p>		
Water Supply					
WATER-1	<p>Depletion of Groundwater. To mitigate potentially significant effects on local groundwater levels associated with the freshwater extraction wells, in the event that</p>	<p>During final project design and before final</p>	<p>PG&E</p>		

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Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	freshwater is to be supplied from wells rather than from a surface intake, a hydrologic analysis shall be conducted during the design phase of the project to evaluate the proposed pumping rates for extraction, the potential cone of depression, and the extraction effect on any existing wells in proximity. Proximity shall be defined by the cone of depression boundary of any well to be used in the extraction process. Extraction well location and/or extraction rates shall be adjusted during project design based on this analysis to ensure that extraction does not substantially adversely affect the production rates of existing nearby wells (e.g., adversely affect well production such that existing land uses would not be supported). It shall be demonstrated using computer simulations or other appropriate hydrologic analysis that production rates of existing nearby wells will not be substantially affected before the installation of any new freshwater extraction wells.	approval of the design of this project component			

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Exhibits

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MITIGATION MONITORING AND REPORTING PROGRAM FOR THE TOPOCK COMPRESSOR STATION GROUNDWATER REMEDIATION PROJECT 5-2

Acronyms

Department of Toxic Substances Control (DTSC)
environmental impact report (EIR)
California Environmental Quality Act (CEQA)
Pacific Gas and Electric (PG&E)
Topock Compressor Station (compressor station)
mitigation monitoring and reporting program (MMRP)
Programmatic Biological Agreement (PBA)
Corrective Measures Implementation Workplan (CMI Workplan)
Technical Review Committee (TRC)
Request for Qualifications (RFQ)
Cultural Impact Mitigation Program (CIMP)
most likely descendent (MLD)
best management practices (BMPs)
standard operating procedure (SOP)
Occupational Safety and Health Administration's (OSHA's)
numeric effluent levels (NELs)
numeric action levels (NALs)
Storm Water Multi-Application Reporting and Tracking System (SMARTS)
Sound Transmission Class (STC)