
State Water Resources Control Board

REISSUANCE OF CLEAN WATER ACT SECTION 401
WATER QUALITY CERTIFICATION FOR SOUTHERN CALIFORNIA EDISON
TEHACHAPI RENEWABLE TRANSMISSION LINE PROJECT SEGMENT 6, LOS
ANGELES, CALIFORNIA
FILE NO. SB11003IN

PROJECT: Southern California Edison (SCE) – Tehachapi Renewable Transmission Line Project (TRTP) Segment 6 (Project)

APPLICANT: Mr. Hazem Gabr
c/o Amanda Solomon
Southern California Edison
2131 Walnut Grove Avenue
Rosemead, CA 91770

This Water Quality Certification (Certification) responds to your request on behalf of SCE for Certification for the Project. Your application for TRTP Segment 6 was received on October 5, 2012, and was deemed complete on November 26, 2012. On August 23, 2011, the State Water Resources Control Board (State Water Board) issued a Certification for the SCE TRTP Segment 6. The U.S. Army Corps of Engineers (Corps) had enrolled the Project under Nationwide Permit (NWP) 12. However, the NWP for the Project will expire on March 18, 2013. In order to renew their enrollment under NWP 12, SCE needs to provide the Corps with a reissued Certification. As a result, the State Water Board is now reissuing the Certification for TRTP Segment 6. This reissued Certification incorporates the original Certification for the Project that was issued on August 23, 2011, as well as the Project modifications presented in SCE's permit application for reissuance on October 5, 2012. Modifications also include a change in Project location. This Certification only applies to Project activities within the Los Angeles Regional Water Quality Control Board (Los Angeles Regional Water Board).

ACTION:

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| <input type="checkbox"/> Order for Standard Certification | <input type="checkbox"/> Order for Denial of Certification |
| <input checked="" type="checkbox"/> Order for Technically Conditioned Certification | <input type="checkbox"/> Order for Waiver of Waste Discharge Requirements |

AUTHORIZATION:

The Project as modified involves construction of new and upgraded transmission infrastructure along the Project alignment, which extends from the Vincent substation (near State Route 14), just north of the northern boundary of the Angeles National Forest (ANF), to the south 0.33 miles outside the southern boundary of the ANF (northeast of the City of Duarte). The Project area spans three watersheds: the Santa Clara-Calleguas Hydrologic Unit (HU), the Los Angeles River HU, and the San Gabriel River HU. The Project involves installation of transmission towers, related structures, and a transmission line. Project construction requires developing and grading wire setup sites (for pulling, splicing, stringing wire), helicopter yards, construction work areas, and access routes. The following construction activities will be required to accommodate construction vehicles: modification of drainage crossings in access roads (including temporary and permanent wet crossings); installation or replacement of McCarthy drains to reduce erosion; creation of new access roads; and stabilization, widening, and/or maintenance grading of existing access roads. These construction activities will result in the fill of waters of the U.S. More details about the Project are provided in Attachments B through H of this Certification.

PROJECT MODIFICATIONS:

The original Certification for the Project covered 0.41 acre and 4,725 linear feet of permanent impacts and 4.45 acres and 16,815 linear feet of temporary impacts to waters of the U.S. Impacts to waters of the U.S. have changed since the original Certification was issued. The project modifications for Segment 6 include an increase of 0.02 acre and 262 linear feet of permanent impacts. In addition, there is a decrease of 0.004 acre and increase of 44 linear feet of temporary impacts to waters of the U.S. As a result, the reissued Certification addresses a total of 0.43 acre and 4,987 linear feet of permanent impacts and 4.45 acres and 16,859 linear feet of temporary impacts to waters of the U.S.

Some modifications that have occurred along the Project alignment since the original Certification was issued include reduction or removal of impact types, changes in impact type from permanent to temporary or vice versa, shifts in impact areas, or additional minor impacts. These modifications were triggered by refined Project engineering plans, additional approved construction contractor changes regarding construction methods and feasibility, and updated or new jurisdictional feature mapping at impact locations. The following provides more details for the modifications:

Previously Avoided Features: ICF Regulatory Specialists (consultants for SCE) conducted a wetland delineation in new portions of the Project area that were not previously surveyed that included 12 features and identified two of those that will be impacted by the Project.

Winter Road Repairs: Several road improvements originally proposed as part of the Project were escalated to emergency road repair work and implemented by the ANF staff as a result of the Station Fire and extreme storm activity during the 2011–2012 winter season. Therefore, previous impacts will be reduced because either (1) they will not be further modified by the Project, and therefore the previous Project impact areas have been removed from the proposed project activities, or (2) previously anticipated Project impacts will trigger fewer impacts than previously proposed as a result of the winter road repair work that has already been implemented by the ANF.

STANDARD CONDITIONS:

1. This Certification action is subject to modification or revocation upon administrative or judicial review, including review and amendment pursuant to section 13330 of the Water Code and article 6 (commencing with section 3867) of chapter 28, title 23 of the California Code of Regulations.
2. This Certification action is not intended and shall not be construed to apply to any activity involving a hydroelectric facility requiring a Federal Energy Regulatory Commission (FERC) license or an amendment to a FERC license, unless the pertinent certification application was filed pursuant to subsection 3855(b) of chapter 28, title 23 of the California Code of Regulations, and the application specifically identified that a FERC license or amendment to a FERC license for a hydroelectric facility was being sought.
3. This Certification is conditioned upon total payment of any fee required under chapter 28, title 23 of the California Code of Regulations and owed by the applicant.

ADDITIONAL CONDITIONS:

1. SCE shall comply with all water quality objectives required by regional and statewide water quality control plans and policies.
2. SCE shall be covered under the new National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activities (Order 2009-0009-DWQ as amended by 2010-0014-DWQ)(Construction Storm Water Permit), which became effective on July 1, 2010. SCE is currently covered under three Construction Storm Water Permits as a Linear Underground/Overhead Project (LUP): SCE TRTP Segment 6A TL Structures (WDID# 4 19C361973), SCE TRTP Segment 6B Transmission Line Structures (WDID# 4 19C362426), and the Segment 6C Transmission Line Structures (WDID# 4 19C363086).

3. SCE shall implement the Applicant-Proposed Measures (APM) and Mitigation Measures (MM) described in the Final Environmental Impact Report (FEIR) (December 2009)/Final Environmental Impact Statement (FEIS) (September 2010) for the SCE TRTP (see Attachment G).
4. Best Management Practices (BMPs)
 - a) Appropriate BMPs shall be implemented and maintained throughout Project activities to minimize sediment disturbance and suspension within surface waters. These BMPs are described in this Certification, the Project Stormwater Pollution Prevention Plans (SWPPPs) for Segments 6A, 6B, and 6C, and also in the FEIR (December 2009) and the FEIS (September 2010) for the SCE TRTP. All BMP materials shall be on-site prior to construction activity and ready for use. BMPs shall be in full compliance with all specifications governing their proper design, installation, operation, and maintenance of such management practices throughout their useful life.
 - b) Substances resulting from construction activities that could be harmful to aquatic life shall not be discharged to waters of the state, including but not limited to petroleum lubricants and fuels; cured and uncured cements; epoxies, paints and other protective coating materials; Portland cement, concrete, or asphalt concrete, and washings and cuttings thereof.
 - c) Vehicles shall not be driven or equipment operated in waters of the state on the Project site, except as necessary to complete the proposed Project.
 - d) Fueling, lubrication, maintenance, storage, and staging of vehicles and equipment shall be outside of waters of the state, and shall not result in a discharge or a threatened discharge to waters of the state.
 - e) A daily log shall be maintained to note the presence and absence of waste releases from vehicles and equipment within or adjacent to waters of the state. Copies of the daily log shall be available on site. Daily visual inspections for waste releases of all vehicles and equipment parked or operating within 50 feet of waters of the state shall be conducted before the vehicles or equipment are operated for the work day. Spillage and leaks shall be reported in the daily log when they occur. Presence of any spillage from leaks shall be reported in the daily log and contaminated soils shall be removed immediately from the site and disposed of at an approved area or facility. The State Water Board or Los Angeles Regional Water Board staffs may request this information at any time.
 - f) Any waste releases from vehicles or equipment of 5 gallons or more shall be reported to the State Water Board and Los Angeles Regional Water Board within 24 hours with an explanation of how the spillage was remedied.

- g) All work areas shall be effectively isolated from streamflows using suitable control measures before commencement of any in-water work. The diverted streamflow shall not be contaminated by construction activities. Structures for isolating the in-water work area and/or diverting the streamflow (e.g., cofferdam, geo-textile silt curtain) shall not be removed until all disturbed areas are cleaned of debris and stabilized.
- h) In the event of rain, the in-water work area shall be temporarily stabilized before streamflow exceeds the capacity of the diversion structure. The streambed shall be stabilized so that the disturbed areas will not come in contact with the streamflow.
- i) If restoration of disturbed areas is required, viable seed of native species collected in the Santa Clara-Calleguas, Los Angeles River, and San Gabriel River watersheds shall be used for habitat restoration.
- j) When the Project is completed, any trash, excess material or other debris shall be removed from the work area and disposed of properly.
- k) All ground disturbance activities shall employ appropriate washout and erosion control BMPs to protect waters of the state.
- l) Any straw or hay BMPs used for sediment barriers must be weed free.
- m) No rubbish shall be deposited within 100 feet of waters of the state.
- n) The limits of Project disturbance shall be clearly identified in the field with highly visible markers such as construction fencing or silt barriers prior to commencement of construction activities within waters of the state. Such identification shall be properly maintained until construction is completed and soils have been stabilized. Equipment, materials, or any other substances or activity that impact waters of the state outside of the permits limits (as shown on the permit maps/drawings), is prohibited. This requirement is only waived if all waters of the state are avoided on-site, and if there are no off-site waters within 100 feet of the Project site.

5. Design of Water Crossings and Stormwater controls

- a) Designs and details for all water body crossing types and modifications shall be submitted to the State Water Board for review and approval at least 30 days prior to installation of crossings and modifications to water bodies. Water body crossings and modifications shall not be implemented until State Water Board staff have approved the crossing designs.
- b) Any structure/culvert placed within a stream where fish (as defined in California Fish and Game Code section 45) do or may occur, shall be designed,

constructed and maintained such that it does not constitute a barrier to upstream or downstream movement of aquatic life, or cause an avoidance reaction by fish that impedes their upstream or downstream movement. This includes but is not limited to the supply of water at an appropriate depth, temperature, and velocity to facilitate upstream and downstream fish migration. If any aspect of the proposed Project results in a long-term reduction in fish movement, SCE shall be responsible for all future activities and expenditures necessary (as determined by the State Water Board and Los Angeles Regional Water Board) to secure passage of fish across the structure.

- c) Storm drain lines/culverts and other stream crossing structures shall be designed and maintained to accommodate at least a 50-year, 24-hour storm event, including associated bedload and debris movement. The storm drain lines/culverts, the outfall structure, and other stream crossing structures shall be properly aligned within the stream and otherwise engineered, installed, and maintained, to ensure resistance to washout and to prevent erosion and/or fill of the stream. Water velocity shall be dissipated at outfalls to reduce erosion.

6. Flow Diversions during in-water construction

- a) Bridges, culverts, dip crossings, or other structures shall be installed so that water flow is not impaired. Bottoms of temporary culverts shall be placed at stream channel grade and bottoms of permanent culverts shall be placed at or below stream channel grade.
- b) Cofferdams and water barrier construction shall be adequate to prevent seepage into or from the work area. Cofferdams or water barriers shall not be made of earth or other substances subject to erosion or that contain pollutants. When dewatering is necessary to create a temporary dry construction area, the water shall be pumped through a sediment-settling device before it is returned to the water body. The enclosure and the supportive material shall be removed when the work is completed, and removal shall proceed from downstream to upstream.
- c) Flow diversions shall be done in a manner that shall prevent pollution and/or siltation and provide flows to downstream reaches. Said flows shall be of sufficient quality and quantity, and of appropriate temperature, to support fish or other aquatic life normally present both above and below the diversion. Diversions shall be engineered, installed, and maintained to ensure resistance to washout and erosion of the water body. All open flow temporary diversion channels will be lined with filter fabric or plastic to prevent channel erosion and sediment transport. Normal flows shall be restored to the affected stream immediately upon completion of work at that location. All flow diversion facilities shall be removed and the site restored to pre-project conditions.
- d) If dewatering is required for groundwater control, SCE shall consult with the Los Angeles Regional Water Board to determine if additional permits are required.

7. Monitoring

During surface water diversions or dewatering, upstream and downstream monitoring for the following shall be implemented:

- pH
- temperature
- dissolved oxygen
- turbidity
- total suspended solids (TSS)

Analysis must be performed using approved US Environmental Protection Agency methods, where applicable. These constituents shall be measured at least once prior to diversion and then monitored on a daily basis during the first week of diversion and/or dewatering activities, and then on a weekly basis thereafter, until instream work is complete. Turbidity measurements shall be collected one hour after barrier installation and one hour after barrier removal.

Results of the analysis shall be submitted to the State Water Board within 30 days after completing the surface water diversion or dewatering. A map or drawing indicating the locations of the sampling points shall be included with each submittal. Diversion activities shall not result in the degradation of beneficial uses or violation of water quality objectives of the receiving waters. Constituent measurements must comply with limits below. Any violations of these limits may result in corrective and/or enforcement actions, including increased monitoring and sample collection.

a) pH

For waters of the state subject to the Water Quality Control Plan, Los Angeles Region (Los Angeles Basin Plan), the pH of inland surface waters pH shall not be depressed below 6.5 or raised above 8.5 as a result of waste discharges. Ambient pH levels shall not be changed more than 0.5 units from natural conditions as a result of waste discharge.

b) Temperature

For waters of the state in the Los Angeles Basin Plan with the designated beneficial use of WARM, water temperature shall not be altered by more than 5°F above the natural temperature. At no time shall these WARM designated waters be raised above 80°F as a result of waste discharges.

c) Dissolved Oxygen

For waters of the state in the Los Angeles Basin Plan, at a minimum, the mean annual dissolved oxygen concentration of all waters shall be greater than 7mg/L,

and no single determination shall be less than 5 mg/L, except when natural conditions cause lesser concentrations.

The dissolved oxygen content of all surface waters designated as WARM shall not be depressed below 5 mg/L as a result of waste discharges.

The dissolved oxygen content of all surface waters designated as COLD shall not be depressed below 6 mg/L as a result of waste discharges.

The dissolved oxygen content of all surface waters designated as both COLD and SPWN shall not be depressed below 7 mg/L as a result of waste discharges.

d) Turbidity

For waters of the state in the Los Angeles Basin Plan, waters shall be free of changes in turbidity that cause nuisance or adversely affect beneficial uses. Increases in natural turbidity attributable controllable to water quality factors shall not exceed the following limits:

Where natural turbidity is between 0 and 50 Nephelometric Turbidity Units (NTU), increases shall not exceed 20%.

Where natural turbidity is greater than 50 NTU, increases shall not exceed 10%.

e) Suspended Materials

For the Los Angeles Basin Plan, waters shall not contain suspended or settleable material in concentrations that cause nuisance or adversely affect beneficial uses.

Any violations of the limits described above may result in corrective and/or enforcement actions, including increased monitoring and sample collection.

MITIGATION CONDITIONS:

1. To compensate for temporary and permanent impacts to waters of the state, SCE shall implement each measure listed below. Mitigation for impacts is categorized into two types: federal and non-federal lands. Federal lands are those located within the U.S. Forest Service (USFS) and mitigation is conducted in accordance with USFS requirements. Non-federal lands comprise those not within USFS lands that will be mitigated based on State Water Board/Corps requirements. No mitigation is required for maintenance impacts to existing access roads (i.e., re-grading within the existing road prism) during implementation of the Project because it is an ongoing maintenance activity that has occurred since the access roads were constructed. As a result, the total temporary impact acreage is greater than the required mitigation

acreage to restore temporarily impacted areas. Therefore, the totals for mitigation of temporary impacts exclude temporary impacts of 0.25 acres on non-federal lands and 0.31 acres on federal lands, respectively, due to road maintenance. These mitigation requirements may be modified upon approval by State Water Board staff.

a) On **non-federal** land SCE shall mitigate for impacts as follows:

- i. For temporary impacts to 3.87 acres of waters of the state (3.62 acres in the previous Certification), on-site restoration of 3.62 acres of waters of the state shall be provided as per **Mitigation Condition 3.** below (to view details on mitigation acreages see Table 8.1 in Attachment G). As stated above, mitigation will not be required for 0.25 acres of impacts to waters within the existing road prism since the roads are regularly maintained and proposed maintenance grading specifications minimize impacts to waters of the state within the road prism (see Attachment C).
- ii. For permanent impacts to 0.21 acre of waters of the state, restoration, establishment, and/or enhancement of 0.58 acre of waters of the state shall be provided off-site as per **Mitigation Condition 4.d.** below.
- iii. If 0.58 acre of off-site restoration, establishment, and/or enhancement of waters of the state cannot be achieved within a the time limits indicated in the **Mitigation Conditions** of this Certification, the State Water Board will consider the option of preservation of waters of state.
- iv. If the on-site restoration is considered infeasible by the State Water Board, additional off-site mitigation shall be provided; preservation can be purchased to mitigate for the on-site restoration component.
- v. Off-site preservation of waters of the state shall require a greater mitigation ratio than off-site establishment and/or restoration of waters of the state. Preservation ratios shall be determined by the State Water Board based on the parcels SCE selects during the agency approval process and prior to purchase.

b) On **federal land** SCE shall mitigate for impacts as follows:

- i. For temporary impacts to 0.58 acre of waters of the state, on-site restoration of 0.30 acre of waters of the state shall be provided as per **Mitigation Condition 3.** below to view details on mitigation acreages see Table 8.2 in Attachment G). As stated above, mitigation will not be required for 0.31 acres of impacts to waters within the existing road prism since the roads are regularly maintained and proposed maintenance grading specifications minimize impacts to waters of the state within the road prism (see Attachment C).

- ii. For permanent impacts to 0.22 acre of waters of the state, the restoration, establishment, and/or enhancement of 0.73 acre of waters of the state shall be provided off-site as per **Mitigation Measure 4.d.** below.
 - iii. If 0.73 acre of off-site restoration, establishment, and/or enhancement cannot be achieved within a timely manner consistent with this Certification, the State Water Board will consider the option of preservation of waters of the state.
 - iv. If the on-site restoration is considered infeasible by the State Water Board, additional off-site mitigation shall be provided; preservation can be purchased to mitigate for the on-site restoration component.
 - v. Off-site preservation of waters of the state shall require a greater mitigation ratio than off-site creation and/or restoration of waters of the state. Preservation ratios shall be determined by the State Water Board based on the parcels SCE selects during the agency approval process and prior to purchase.
2. SCE shall prepare and implement a Project-wide Mitigation and Monitoring Plan (MMP) for the Project. The MMP shall present anticipated Project impacts and associated mitigation requirements for jurisdictional areas on federal and non-federal land. A Preliminary MMP (PMMP) must be approved by State Water Board staff prior to the start of construction. The PMMP shall include all measures to restore waters of the state on federal and non-federal lands back to pre-Project conditions due to temporary impacts. SCE submitted a PMMP to State Water Board staff on October 31, 2011, and submitted revised materials on November 10, 2011. The PMMP was approved by State Water Board staff on December 15, 2011. The construction start date within waters of the U.S. was February 8, 2012. The Final MMP (FMMP) shall also include compensatory mitigation measures for permanent impacts and will include the submittal dates and elements as described in Mitigation Condition 4.d. below. State Water Board staff can choose to extend the timelines for PMMP and FMMP submittals if progress satisfactory to the State Water Board staff has been made.
 - a) "Start of construction" defined. For the purpose of this Certification, "start of construction" means to engage in a program of on-site construction, including site clearing, grading, dredging, landfilling, changing equipment, substituting equipment, or even moving the location of equipment specifically designed for a stationary source in preparation for the fabrication, erection or installation of the building components of the stationary source.
3. Restoration for temporary impacts shall be as follows:
 - a) Procedures on federal lands. On federal lands, restoration activities shall be in accordance with the U.S. Forest Service (USFS) Habitat Restoration and Reporting Plan (HRRP) (December 2010) which shall be included as an

attachment to the PMMP. The final HRRP shall be approved and provided by USFS prior to implementation. The draft final HRRP was revised by the USFS on December 18, 2012. The HRRP is an attachment to the PMMP and, when finalized, will be attached to the FMMP. Segment 6 project modifications within waters of the state will be included in the FMMP.

- b) Procedures on non-federal lands. On non-federal lands, the habitat restoration component within the PMMP shall also follow the procedures described in the HRRP for the implementation of restoration, establishment, and/or enhancement measures.
- c) Minimum requirements. The PMMP shall include, at a minimum: (i) recontouring the land; (ii) measures to alleviate soil compaction; (iii) pitting or imprinting the surface to allow small areas where seeds and rain water can be captured (where appropriate); (iv) the native plant species to be used, container sizes, and seeding rates; (v) collection, storage and replacement of the topsoil (if it was collected); (vi) seed collection procedures and permits needed; (vii) planting schedule; (viii) measures to control exotic vegetation on site; (ix) specific success criteria; (x) a detailed monitoring program that includes reference sites from the impact area before impacts as well as reference sites of surrounding native habitat; (xi) contingency measures should the success criteria not be met; and (xii) identification of the party responsible for meeting the success criteria and providing for restoration.
- d) Seed source. Per Mitigation Measure B-1a in the FEIR and FEIS for TRTP, all propagules for cuttings and seed shall be collected from local genetic sources in the area (this information is also provided in Attachment H of this Certification). The PMMP will include a seed palette for both federal and non-federal lands. The use of site-specific materials, which are adapted to local conditions, increases the likelihood that the cuttings and seedlings will be successful and maintains the genetic integrity of the local ecosystem. For widespread herbaceous species that are more likely to be genetically homogeneous, seed collection areas may include a broader geographic range. As a rule, native seed should be collected within the same watershed as the disturbance location, within 500 to 1,000 vertical feet of the elevation of the site, and on the same aspect and soil type. No commercial seed shall be utilized unless the collection source is local to the Project area and is certified to be free of noxious weeds. The restoration of the impacted areas will be accomplished primarily through the seeding of native plant species with limited use of container plants. Species may be substituted for or eliminated depending on the availability of appropriate genetic sources, with the consent of the State Water Board. Supply of seed material and container plants will be coordinated by the Restoration Ecologist and purchased by the Restoration Contractor.
- e) Weeding plan. The PMMP for non-federal lands shall include a Weeding Plan for all restoration sites. The Weeding Plan shall in detail, describe how SCE will

control and limit the establishment of non-native annual grasses and weedy forbs. Proper management of weed and grass cover after seeding can dramatically increase the successful establishment of natives from seed. A Weeding Plan was included in the PMMP to the State Water Board on October 31, 2011, and November 10, 2011.

- f) **Timing.** Irrigation plans and mitigation plan construction documents shall be submitted to State Water Board staff for approval 120 days prior to restoration implementation. SCE shall restore temporary impacts to waters of the state within 12 months following completion of Project activity at individual restoration locations. This period may be extended to accommodate proper planting times. If restoration is not completed within two years of the impacts, additional mitigation will be required to offset temporal loss of waters of the state. These timelines may be extended and approved by State Water Board staff if progress satisfactory to State Water Board staff has been made.
 - g) **Monitoring.** The restoration of habitat shall be maintained and monitored for a ten-year period according to the PMMP. Maintenance, monitoring, and reporting shall be conducted following a prescribed schedule to assess progress and identify potential problems with the restoration. Remedial action (e.g., additional planting, weeding, erosion control, use of container stock, supplemental watering, etc.) shall be taken by an experienced, licensed Habitat Restoration Contractor during the maintenance and monitoring period if necessary to ensure the success of the restoration. If the restoration fails to meet the success criteria listed in the PMMP after the maintenance and monitoring period, maintenance and monitoring will be extended beyond the ten-year period until the criteria are met or unless otherwise approved by State Water Board staff.
4. To compensate for permanent impacts to waters of the state, SCE shall implement each measure listed below.
- a) **Compensatory Mitigation Sponsor**
 - i. **Sponsor.** SCE submitted conceptual information on May 10, 2011 that described the proposed compensatory mitigation for Project impacts. SCE intends to mitigate Project impacts to streams through the Santa Monica Mountains Conservancy's (SMMC) Los Angeles County Aquatic Resource In-Lieu Fee Mitigation Program established by the Corps. The In-Lieu Fee Program allows SMMC or a SMMC joint-powers authority (i.e., Mountains Recreation and Conservation Authority (MRCA)), to purchase and restore habitat within the Los Angeles County watersheds impacted by the Project.
 - ii. **Agreement.** SCE executed a Memorandum of Agreement with MRCA (the mitigation sponsor) for compensatory mitigation on December 27, 2011, which was provided to the State Water Board on December 28, 2011. This satisfied conditions in the original Certification as follows:

- The agreement must clearly indicate the party or parties responsible for the implementation, performance, and long-term management of the compensatory mitigation project(s). This includes the requirement for annual reporting.
 - The instrument must also contain a provision expressing the sponsor's agreement to assume responsibility for SCE's compensatory mitigation requirements as specified herein, once SCE has secured the appropriate number and resource type of credits from the sponsor and the State Water Board has received documentation of the transaction.
 - A copy of the mitigation agreement shall be provided to the State Water Board and Los Angeles Regional Water Board.
- iii. Responsibilities. The Memorandum of Agreement executed between SCE and MRCA on December 27, 2011 states that the sponsor, MRCA, has accepted responsibility for providing the required compensatory mitigation. This satisfied the condition in the original Certification as follows:
- SCE shall retain responsibility for providing the compensatory mitigation until the appropriate number and resource type of credits have been secured from a sponsor and the State Water Board has received documentation that confirms that the sponsor has accepted the responsibility for providing the required compensatory mitigation. This documentation may consist of a letter or form signed by the sponsor, with the permit number and a statement indicating the number and resource type of credits that have been secured from the sponsor. Copies of this documentation will be retained in the administrative records for both the permit and the instrument.
- iv. Non-compliance with compensatory mitigation. If the sponsor fails to provide the required compensatory mitigation, the State Water Board may pursue measures against the sponsor to ensure compliance.
- v. Timing. All compensatory mitigation shall be acquired or secured within 24 months of start of construction. Any delay in acquiring or securing compensatory mitigation shall require approval from State Water Board staff and may result in higher mitigation ratio requirements to offset the additional temporal loss of waters of the state.
- b) Financial Assurances for Compensatory Mitigation: Securities
- i. SCE issued a final letter of credit through JP Morgan Chase Bank with the State Water Board as beneficiary for SCE compensatory mitigation obligations on December 28, 2011. This satisfied conditions in the original Certification as follows:

- Prior to the start of construction, SCE shall establish in favor of the State Water Board an irrevocable letter of credit in an amount sufficient to pay for the cost of SCE's compensatory mitigation obligations under this Certification. SCE shall prepare a draft letter of credit and submit it to the State Water Board for its approval. The letter of credit shall allow the State Water Board to immediately draw on the letter of credit if the State Water Board determines in its sole discretion that SCE has failed to meet its mitigation obligations.
 - SCE's bank may finalize and execute the letter of credit after the State Water Board approves the draft letter of credit. The State Water Board shall notify SCE that it may begin the Project upon receipt of the original letter of credit in the principal sum and form approved by the State Water Board, provided SCE has complied with any other pre-Project requirements this Certification specifies.
- ii. If SCE has not met its mitigation obligations within 60 days prior to the letter of credit's expiration date, SCE shall confirm with its bank that the expiration date will be extended. If the bank elects not to extend the expiration date, SCE shall establish a new letter of credit to replace the original letter of credit. The new letter of credit shall be subject to the State Water Board's approval following the same procedure described in the conditions above. SCE shall have a letter of credit in place, as described above, until SCE has met its mitigation obligations. According to the Letter of Credit, the expiration date (12/28/12) will automatically be extended without amendment for one year from the expiration date.
- iii. If SCE is unable to establish a letter of credit, it shall arrange a different security instrument with the State Water Board.
- c) Compensatory Mitigation Site Approval
- i. Prior to purchasing the appropriate number and resource type of credits from the sponsor, SCE shall obtain approval from the State Water Board that the compensatory mitigation sites satisfy the compensatory mitigation requirements and adequately replace the lost functions and values of waters of the state impacted by the Project in accordance with this Certification.
- ii. As required in 4.a.iv. above, SCE must provide full, adequate compensatory mitigation for the Project, approved by State and Regional Water Board staffs, within 24 months of the start of construction. Compensatory mitigation shall be in the form of purchased credits and/or properties, applicable funding agreements for purchase and management in perpetuity, an approved FMMP, and or an in-lieu fee program agreement. If SCE cannot provide full, adequate compensatory mitigation within 24 months of the start of construction, SCE will be in violation of this Certification and subject to

administrative civil liabilities under the Water Code, section 13385. Under Water Code section 13385, both the State and Regional Water Boards can impose administrative civil liabilities for any violation of a water quality certification issued pursuant to Section 401 of the Clean Water Act. Timelines may be extended and approved by State Water Board staff if progress satisfactory to the State Water Board has been made.

d) SCE shall provide a FMMP that includes the following:

i. FMMP submittal dates. SCE submitted a draft FMMP to State Water Board staff on April 25, 2012; however, the draft FMMP must be revised because of changes in the Project and changes in potential compensatory mitigation sites. The revised submittal schedule shall be as follows:

(a) SCE shall submit a draft FMMP to the State Water Board and Regional Water Board within one year of issuance of this Certification.

(b) SCE shall submit the final FMMP to the State Water Board and Regional Water Board within 180 days of State Water Board and Regional Water Board approval of the draft FMMP.

Timelines may be further extended by State Water Board staff if progress satisfactory to State Water Board staff has been made.

- ii. FMMP general requirements. The draft FMMP will include the PMMP (for temporary impacts) as well as compensatory mitigation planning for permanent Project impacts on federal and non-federal lands. The draft FMMP will include descriptions of the proposed mitigation site acquisitions required for compensatory mitigation. The draft FMMP should be detailed enough for the State and Regional Water Boards to determine whether the proposed mitigation sites satisfy the compensatory mitigation requirements and replace the lost functions and values of waters of the state impacted by the Project.
- iii. Protection in perpetuity. The FMMP shall detail the mechanisms of protection and management of the mitigation property in perpetuity and must be approved by State Water Board staff.
- iv. Management plans for compensatory mitigation sites. The FMMP shall describe interim and long-term management plans as proposed by the sponsor for all compensatory mitigation sites and will include the following:
- (a) Site selection. A description of the factors considered during the site selection process. This should include consideration of watershed needs, and the practicability of accomplishing ecologically self-sustaining aquatic

resource restoration, establishment, enhancement, and/or preservation at the compensatory mitigation site.

- (b) **Baseline information.** A description of the ecological characteristics of the proposed compensatory mitigation project site(s) and how that compares to the characteristics of the impact site(s). This may include descriptions of historic and existing plant communities, historic and existing hydrology, soil conditions, a map showing the locations of the mitigation site(s), other site characteristics for those site(s), and other site characteristics appropriate to the type of resource proposed as mitigation.
- (c) **Determination of credits/financing.** A description of the number of credits or amount of other financing to be provided, including a brief explanation of the rationale for this determination.
- (d) **Site work plan.** Detailed written specifications and work descriptions for the compensatory mitigation project(s), including timing, sources of water, methods for establishing desired plant communities, erosion control measures, etc.
- (e) **Maintenance plan.** A description and schedule of maintenance requirements to ensure the continued viability of the resource once initial construction is completed.
- (f) **Performance standards.** Ecologically-based standards that will be used to determine whether the compensatory mitigation project is achieving its objectives.
- (g) **Monitoring requirements.** A description of parameters to be monitored in order to determine if the compensatory mitigation project is on track to meet performance standards and if adaptive management is needed. A schedule for monitoring and reporting must be included.
- (h) **Long-term management plan.** A description of how the compensatory mitigation project(s) will be managed after performance standards have been achieved to ensure the long-term sustainability of the resource, including long-term financing mechanisms and the party responsible for long-term management.
- (i) **Adaptive management plan.** A management strategy to address unforeseen changes in site conditions or other components of the compensatory mitigation project(s). The adaptive management plan will guide decisions for revising the compensatory mitigation plans and implementing measures to address both foreseeable and unforeseen circumstances.

5. Reporting for temporary and permanent mitigation shall be as follows:

- a) An annual mitigation monitoring report shall be submitted to the State and Regional Water Board for each site restored from temporary impacts and all sites provided for compensatory mitigation as detailed in the FMMP. These reports shall be provided by January 1 of each year for 10 years, or until the site restoration, establishment, enhancement and/or preservation has met its success criteria identified in the FMMP. It is the obligation of SCE to provide these reports and to direct the sponsor of the compensatory mitigation sites detailed in the FMMP to provide said reports as part of their agreement noted in **Mitigation Condition 4.a.ii** above. This report shall include an evaluation of the sites as compared to the success criteria identified in the FMMP. Photographs from designated photograph stations shall be included. All reports shall include the following:
- 1) All reports shall include the file number of this Certification SB11003IN.
 - 2) Photographs, Surveys, and/or Videos. SCE shall submit pre-construction surveys and photo (or video) documentation showing the condition of waters of the state and associated habitat, and identifying their specific locations.
 - 3) SCE shall submit a post-compliance report to the State and Regional Water Boards within thirty (30) days from the date construction is completed. The post-compliance report shall include: 1) A comparison including map overlays of, and a discussion on, the pre- and post-construction conditions (with supporting photograph documentation) of waters of the state and 2) a summary of Project compliance (including noncompliance and corrective actions taken to achieve compliance).
 - 4) SCE shall submit an annual mitigation monitoring report to the State Water Board for each of the Project sites by January 1 of each year for 10 years after the restoration/planting. This report shall include an evaluation of the sites as compared to the success criteria identified in the FMMP. Photographs from designated photograph stations shall be included.
 - 5) Timelines may be extended and approved by State Water Board staff if progress satisfactory to the State Water Board has been made.

VIOLATIONS:

1. SCE, or its contractor, or subcontractors shall verbally report any noncompliance to the Certification Program Manager of the State Water Board within 24 hours of the

time when SCE or its contractor, or subcontractors become aware of the circumstances of noncompliance.

2. SCE or its contractor, or subcontractors shall report all violations of any terms or requirements of this Order in writing to the State Water Board and Regional Water Board within seven (7) consecutive days from the time SCE becomes aware of the violation. The written report shall contain:
 - a) A description of the violation and its cause.
 - b) The period of the violation event, including dates and times, and if the violation has not been corrected, the anticipated time the violation is expected to continue.
 - c) Steps taken or planned to reduce, eliminate, and prevent recurrence of the violation.
3. In the event of any violation or threatened violation of the requirements of this Order, the violation shall be subject to any remedies, penalties, processes, or sanctions as provided for under State law.
4. In response to a suspected violation of any requirement of this Order, the State Water Board may require the holder of any permit or license subject to this Certification to furnish, under penalty of perjury, any technical or monitoring reports the State Water Board deems appropriate, provided that the burden, including the cost of the reports, shall be in reasonable relationship to the need for the reports and the benefits to be obtained from the reports.
5. In response to any violation of the requirements of this Order, the State Water Board may add to or modify the requirements of this Order as appropriate to ensure compliance.

ADMINISTRATIVE CONDITIONS:

1. The State Water Board reserves the right to suspend, cancel, or modify and reissue this Certification, after providing notice to SCE and/or responsible contractor/sub-contractor, if the State Water Board determines that SCE or its agents fail to comply with any of the terms or requirements of this Certification.
2. A copy of this Certification, the application, and supporting documentation must be available at the Project site during construction for review by site personnel and agencies. All personnel performing work on the proposed Project shall be familiar with the content of this Certification and its posted location on the Project site.
3. SCE shall grant State Water Board and Los Angeles Regional Water Board staffs, or an authorized representative, upon presentation of credentials and other documents as may be required by law, permission to enter the Project site at reasonable times,

to ensure compliance with the terms and requirements of this Certification and/or to determine the impacts the Project may have on waters of the state.

STATE WATER BOARD CONTACT PERSON:

If you have any questions, please contact State Water Board Environmental Scientist Bob Solecki at (916) 341-5483, via e-mail at rsolecki@waterboards.ca.gov, or by mail at:

State Water Resources Control Board
401 Certification & Wetland Program
P.O. Box 100, Sacramento, CA 95812-2000 (by mail)
1001 I St., 15th Floor, Sacramento, CA 95814. (by hand delivery)

You may also contact Bill Orme, Chief of the Water Quality Certification Unit, at (916) 341-5464 or via e-mail at borme@waterboards.ca.gov.

CALIFORNIA ENVIRONMENTAL QUALITY ACT:

On December 17, 2009, the California Public Utilities Commission (CPUC), as lead agency, certified a Final Environmental Impact Report (FEIR) for the Tehachapi Renewable Transmission Project Segment 4-11 (State Clearinghouse No. SCH 2007081156) in accordance with the California Environmental Quality Act (CEQA). In making its determinations and findings, the State Water Board must presume that the CPUC certified environmental document comports with the requirements of CEQA and is valid. (Pub. Resources Code, § 21167.3, subd. (b).). The FEIR and Notice of Determination may be viewed at the following Web sites:

ftp://ftp.cpuc.ca.gov/gopher-data/enviro/tehachapi_renewables/TRTP.htm
<http://www.ceqanet.ca.gov/noddescription.asp?DocPK=639084>

The State Water Board has determined that project modifications would not trigger the need for subsequent or supplemental environmental analysis of the Project under Public Resources Code section 21166 or California Code of Regulations, title 14, sections 15162 and 15163, at this time. The CPUC has also confirmed via email on December 10, 2012, that the FEIR covers TRTP Segment 6 project modifications.

Project Modifications with Regard to CEQA

As described above, project modifications include reduction or removal of impact types, changes in impact type from permanent to temporary or vice versa, shifts in impact areas, or additional minor impacts. The State Water Board has determined that none of the factors exist that would trigger the need for subsequent or supplemental environmental analysis of the Project under Public Resources Code section 21166 or California Code of Regulations, title 4, sections 15162 and 15163, as a result of these

modifications. The State Water Board concludes the modifications are not changes in the Project that (1) have the potential to create a new significant effect not previously analyzed, or that (2) will be undertaken under a substantial change in the circumstances requiring major revisions to previous CEQA documents, or that (3) will be undertaken without consideration of any new information of substantial importance previously unknown at the time of the original FEIR. The reasons are stated below:

1. There are no new significant environmental effects or any substantial increase in the severity of previously identified significant effects:

The proposed modification results in a decrease of impacts to jurisdictional waters of the state in the amount of 0.004 acre of temporary impacts and an addition 0.02 acre of permanent impacts. This equates to a less than 1% increase in both temporary and permanent impacts to TRTP 4-11 project-wide waters of the state impacts. Therefore, this change is not considered to be a substantial increase in impacts and would not result in changes to the significance of environmental effects provided in the FEIR. Additional jurisdictional impacts are required to be mitigated at the compensatory mitigation ratios proposed in the FEIR and this Certification, as such, impacts are considered to be less than significant.

All proposed jurisdictional impacts for these modifications would also require satisfaction of any other permit requirements or federal, state, and local approvals, including obtaining Section 404 authorization from the Corps and an amendment to the California Department of Fish and Wildlife (CDFW) streambed alteration agreement (SAA). The Corps issued a denial without prejudice letter for the Project 404 permit on December 3, 2012, indicating that SCE can reinstate permit processing if subsequent approval is received from the appropriate agencies. CDFW is currently processing an amendment for the streambed alteration agreement for Segment 6 to cover the proposed areas that have been modified.

The U.S. Fish and Wildlife Service (USFWS) issued a non-jeopardy Biological Opinion (BO) (FWS-10B0117-1 OF0215) for the TRTP on July 31, 2010, including Segment 6. A Letter of Concurrence (FWS-10B0117-10F0215-R001) was issued by the USFWS on January 13, 2012 providing coverage under the BO for revised work areas not included in this Certification. Since none of the Segment 6 project modifications are located within red-legged frog or arroyo toad occupied habitat covered by the BO, it was determined that no further consultation with the USFWS will be required.

2. There are no substantial changes that have occurred with respect to the circumstances under which the project is undertaken which would cause the effects cited in (1) above:

No new circumstances have arisen since the time of the Notice of Determination of the FEIR that would change the significance of environmental effects provided in the FEIR with respect to this modification request. There have been no changes to the listing status of sensitive species with the potential to be affected by the Project. As stated

above, all impacts to federally threatened or endangered species, as well as state threatened or endangered species are covered under the existing BO. Finally, proposed impacts occur within areas previously surveyed and analyzed under the FEIR and no substantial changes to the baseline conditions established in the FEIR have occurred.

- 3. There has been no new information that was unknown at the time of the previous FEIR that reveals effects cited in (1) above, or that one or more significant effects could be reduced by mitigation measures or alternatives not adopted by the project proponent that were either (a) previously thought to be infeasible, but are in fact feasible or are (b) considerably different.**

No new information has been identified that would change the impact thresholds or findings of the FEIR or change the proposed implementation of mitigation measures previously disclosed in the FEIR.

Through the TRTP variance process, the CPUC has verified on December 10, 2012 that the Project changes and impacts proposed to jurisdictional waters of the state in this modification are consistent with the findings in the FEIR and do not require subsequent analysis under CEQA.

CEQA Findings on Individual Impacts

The State Water Board reviewed and evaluated the significant and potentially significant individual Project impacts to water quality identified in the FEIR. The impacts to water quality that result from the Project activities are described in Attachment C. The applicant-proposed measures (APMs) and mitigation measures (MMs) discussed in the FEIR were adopted to reduce and minimize Project impacts. The various APMs and MMs related to water quality include development of a SWPPP with accidental spill control procedures, establishment of an environmental training program, implementation of flood and erosion structure damage protection measures, implementation of compensatory mitigation for impacts to special status species, and cessation of construction in the Angeles National Forest during heavy precipitation. The APMs and MMs are incorporated into this Certification as changed in Attachment H. The State Water Board finds that these mitigation measures for significant and potentially significant individual Project water quality impacts as identified in the FEIR, along with the measures proposed in the application for Certification and supplemental application materials, the conditions in the Certification, and information in the attachments to the Certification, to be adequate to reduce non-cumulative water quality impacts to less than significant levels.

CEQA Findings on Cumulative Impacts

The FEIR evaluates nine cumulative impacts pertaining to water resources that are significant and unavoidable. The nine cumulative impacts are as follows:

Hydrology and Water Quality section of the FEIR

- Construction activities would degrade surface water quality through erosion and accelerated sedimentation (Impact H-1)
- Construction activities would degrade water quality through the accidental release of potentially harmful or hazardous materials (Impact H-2)

Biological Resources section of the FEIR

- The Project would result in the loss of desert wash or riparian habitat (B-2)
- The Project could result in the loss of California red-legged frogs and mountain yellow-legged frogs (B-8)
- The Project would result in the loss of arroyo toads (B-9)
- The Project could result in the loss of special-status fish (B-12)
- The Project could result in mortality or injury of, and loss of nesting habitat for southwestern pond turtles (B-24)
- The Project could result in injury or mortality of, and loss of habitat for, Coast Range newts (B-26)
- The Project could result in injury or mortality of, and loss of habitat for, terrestrial California Species of Special Concern and Forest Service Sensitive amphibian and reptile species (B-27)

Less than Significant Impacts

The remaining cumulative impacts related to water quality are considered to less-than-significant and are as follows:

- Operation and maintenance activities would degrade water quality through the accidental release of potentially harmful or hazardous materials (Impact H-3)
- Project structures would cause erosion, sedimentation, or other flood-related damage by impeding flood flows (Impact H-4)
- Project structures would be inundated by mudflow (Impact H-5)
- The Project could result in the loss of Critical Habitat for the Santa Ana sucker (B-13)

The FEIR contains mitigation measures for Project hydrology and water quality impacts H-1 and H-2, and the application of these mitigation measures will lessen impacts individually. However, the FEIR notes that no additional mitigation measures have been identified that would reduce cumulative impacts to a less-than-significant level for Hydrology and Water Quality, and therefore this Project's incremental effect could potentially be cumulatively considerable, even with mitigation. The vast majority of reasonably foreseeable future projects are residential developments, which would require the introduction of new impervious areas. Although mitigation measures that would be implemented for the proposed Project would reduce these impacts to a less-than-significant level for the proposed Project itself, several residential development projects are currently scheduled to occur at the same time and in the same vicinity as

the proposed Project. These residential projects would likely implement measures that would reduce impacts to less-than-significant levels. However, the effectiveness of these measures for these residential projects is unknown.

Mitigation measures proposed for the Project (see Attachment H) will be implemented to address impacts to biological resources. These measures include compliance with requirements under water quality permits and the BO. However, even with mitigation incorporated, these actions have the potential to combine with similar impacts of other projects and result in incremental effects. Therefore, these impacts would be considered cumulatively significant and unavoidable.

Statement of Overriding Considerations for Significant and Unavoidable Impacts

As stated above, the State Water Board has determined that changes have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the FEIR based on the MMs, APMs, and Mitigation Monitoring Program in the FEIR, and the requirements of this Certification described under Individual Project Impacts above. However, the alternate mitigation measures or Project alternatives are infeasible or fail to avoid or substantially lessen incremental effects that may be cumulatively considerable to hydrology and water quality when compared to those adopted by CPUC.

In the State Water Board's judgment, the Project and its benefits outweigh its cumulative unavoidable significant impacts regarding water quality. The statement below identifies the reasons why, in the State Water Board's judgment, the benefits outweigh such unavoidable significant impacts. Any one of these reasons is sufficient to justify approval of the Project. The substantial evidence supporting the various benefits can be found in the CPUC's Opinion Granting a Certificate of Public Convenience and Necessity for Decision 09-12-044 (http://docs.cpuc.ca.gov/PublishedDocs/WORD_PDF/FINAL_DECISION/111744.PDF)

The State Water Board recognizes the benefits of the Project, which outweigh the impacts of the Project, listed below. The Project's benefits include:

- enable compliance with the State's Renewable Portfolio Standard (RPS) Program, which requires retail sellers of electricity such as SCE and PG&E to increase their sale of electricity produced by renewable energy sources to 20 percent by 2010;
- enable the interconnection of various wind generation projects in the Antelope Valley-Tehachapi region to the SCE transmission system;
- eliminate existing constraints to the transmission of renewable energy from the Tehachapi and Antelope Valley areas to Southern California; and
- eliminate potential system-wide power flow and reliability problems due to overloading of the existing transmission system.

Specifically, without system improvements provided by the Project, SCE and others could not deliver the necessary significant amounts of wind power from the region. As discussed above, wind provides one of the most economical sources of renewable power, and the Tehachapi area offers the largest wind resource in California and has the undeveloped potential of generating about 1,400 gigawatt-hours per year, with about 4,500 MWs of installed capacity. Additionally, there is significant industry commitment to develop the area for RPS purposes; utilities have received winning bids from, and SCE has signed contracts with, developers of wind projects, the output of which cannot be fully delivered without increased transmission capacity that the proposed Project will provide.

As described in CPUC's Opinion Granting a Certificate of Public Convenience and Necessity, the CPUC finds that the unavoidable impacts are acceptable in light of these substantial benefits. Each benefit set forth above constitutes an overriding consideration warranting approval of the Project, independent of the other benefits, despite each and every significant unavoidable impact.

The State Water Board has balanced these Project benefits against the unavoidable, cumulative water quality impacts identified in the FEIR and have concluded that those impacts are outweighed by the Project benefits. The State Water Board adopts the MMs and the APMs in the FEIR, and the requirements of this Order as described above in Individual Project Impacts, and finds that any residual or remaining cumulative effects on water quality resulting from the Project, identified as significant and unavoidable in the preceding findings of fact, are acceptable due to the benefits set forth in this Statement of Overriding Considerations.

WATER QUALITY CERTIFICATION:

I hereby reissue the Certification for TRTP Segment 6 (FILE NO. SB11003IN) certifying that as long as all of the conditions listed in this Certification are met, any discharge from the referenced Project will comply with the applicable provisions of the Clean Water Act sections 301 (Effluent Limitations), 302 (Water Quality Related Effluent Limitations), 303 (Water Quality Standards and Implementation Plans), 306 (National Standards of Performance), and 307 (Toxic and Pretreatment Effluent Standards). This discharge is also regulated pursuant to State Water Board Water Quality Order No. 2003-0017-DWQ which authorizes this Certification to serve as Waste Discharge Requirements pursuant to the Porter-Cologne Water Quality Control Act (Wat. Code, §13000 et seq.).

Except insofar as may be modified by any preceding conditions, all Certification actions are contingent on (a) the discharge being limited and all proposed mitigation being completed in strict compliance with the conditions of this Certification and the attachments to this Certification, and (b) compliance with all applicable requirements of Statewide Water Quality Control Plans and Policies, the Regional Water Boards' Water Quality Control Plans and Policies, and the FEIR and FEIS for the SCE TRTP.



Thomas Howard
Executive Director

3/7/13
Date

Attachments (9):

- A. Signatory Requirement
- B. Project Information Sheet
- C. Supplement to the Project Information Sheet
- D. Project Location Information
- E. Project Impacts
- F. Comparison of Impacts to Mitigation
- G. Impacts to Waters of the U.S. and Mitigation for Impacts
- H. EIR Mitigation Measures
- I. Project Location Map