



Aliso Canyon Turbine Replacement Project Construction Non-Compliance Report

Incident Date:	February 17, 2015	Report No.:	NCR-02
Date Submitted:	March 24, 2015	Location:	Sharp Ave and San Fernando Mission Rd., Mission Hills
Level:	Level 2 NC Franchise;	Relevant Plan/Measure:	MMCRP; Nesting Bird Management Plan (MM BR-8); APM TT-1; MPR-C
Current Land Use:	Disturbed (Residential)	Sensitive Resources:	Cultural, Biological, Traffic

Description of Incident:

On February 17, 2015 SCE's construction team dug two splice pits roughly 3 foot by 3 foot on either side of the intersection's curb ramp (within the parkway) and bored approximately 25 feet underneath the concrete on the corner of Sharp Avenue and San Fernando Mission Road in Mission Hills, Los Angeles County, California. This work was for construction of the San Fernando Substation Tap and occurred from 7:30 a.m. to 3:00 p.m.

SCE's Project Manager and Environmental Consultant were informed that work was underway around 3:30 p.m. during SCE's daily work call. SCE crews were instructed to immediately stop work. The area was cordoned off by orange cones and caution tape, and the splice pits and excavations were covered with plywood in compliance with MM BIO-11 and to ensure pedestrian safety. SCE informed the Energy Division Compliance Manager the same afternoon.

The work performed was not approved in the Environmental Impact Report and was currently under review by the CPUC to assess compliance with CEQA. The CPUC team had reviewed and provided comments on SCE's draft Minor Project Refinement (MPR)-C, which SCE submitted on February 9, 2015; however, the CPUC had not yet received SCE's responses to these comments and MPR-C had not been approved.

In addition, a Notice to Proceed (NTP) had not yet been issued for this work. The CPUC team was in the process of reviewing SCE's draft Notice to Proceed Request (NTPR)-B, which SCE submitted on February 9, 2015 concurrently with MPR-C for related telecommunications work in this area. The CPUC team had requested responses to comments on the draft NTPR but the CPUC had not yet received SCE's responses to these comments and NTP-B had not been approved.

As part of MPR-C and NTP-B, SCE was required to submit a Traffic Plan (as required by APM TT-1). This plan had been submitted to the CPUC as part of the MPR-C and NTPR-B submittal, but CPUC review and approval was not yet complete. On February 9, 2015 SCE submitted a Traffic Control Plan for the proposed work area. The CPUC team provided comments on the plan on February 13, 2015, but SCE had not yet provide responses to comments or a revised Traffic Control Plan to the CPUC before beginning work.

A cultural monitor was not present during work performed on February 17, 2015, and MPR-C specifically states that cultural monitoring is required in this area. However, an SCE archeologist was able to inspect the spoils on February 18, 2015 and no sensitive resources were found. No known sensitive cultural resources were impacted.

A biological daily sweep, required by the Nesting Bird Management Plan, was not conducted the day construction activities occurred in this area. Had a daily sweep been conducted for this area and revealed an active nest, biological monitoring and a nest buffer would have been required. Without conducting this pre-construction sweep, SCE was unaware of new active nests and risked impacting them should they have been present. However, SCE did conduct a nesting bird survey on February 16,

2015 and no nests were detected; thus, it is unlikely that a nest would have been detected during a sweep. No known sensitive biological resources (e.g., nests) were impacted.


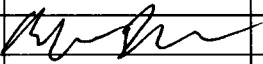
On February 24, 2015, the CPUC Energy Division Project Manager completed his review and issued approval of MPR-C. The CPUC Energy Division PM subsequently approved NTP-B the same day.

Pertinent Plans/Permits/Mitigation Measures:

- By beginning construction without an approved Minor Project Refinement for the San Fernando Tap work, which was not assessed under the EIR in compliance with CEQA, SCE violated the Mitigation Monitoring Compliance and Reporting Plan.
- By beginning construction without an approved Notice to Proceed, SCE violated the Mitigation Monitoring Compliance and Reporting Plan.
- By beginning construction without an approved Traffic Control Plan, SCE violated APM TT-1.
- By beginning construction work without a cultural monitor present, SCE violated their commitment to monitor this area as stated in MPR-C.
- By beginning construction without conducting a daily sweep of the proposed work area, SCE violated the Nesting Bird Management Plan (as required by MM BR-8).

Proposed Resolution:

- SCE Management immediately stopped all work in the San Fernando Substation Tap area
- SCE Management immediately contacted the Energy Division Compliance Manager by phone to inform her of the incident
- SCE confirmed that the excavations and splice pits were properly covered to ensure pedestrian safety and compliance with MM BIO-11
- SCE dispatched a qualified archeologist on February 18, 2015 to evaluate the excavated spoils from the pit excavations for cultural resources. Only modern debris (e.g., modern glass, plastic material, and an old pipe) were uncovered, which are not considered significant or unique resources.
- On February 18, 2015 SCE's Project Manager addressed the entire SCE construction team. He explained and reiterated the importance of the CPUC NTP approval process, stressed the necessity of following all mitigation measures as they pertain to construction, and explained the consequences of non-compliance.
- SCE submitted a non-compliance report on February 19, 2015 to document the incident (Attachment 1)
- SCE's Management team met on February 19, 2015 and scheduled a half-day team Stand Down/Lessons Learned/Updated WEAP training for SCE Project staff to reiterate compliance and communication needs with the team. SCE communicated this commitment to the CPUC team via e-mail following the initial call.

Approvals	Date	Name (print)	Signature	Comments
CPUC Compliance Manager	3/3/15	Lara Rachowicz		
CPUC Compliance Monitor (if applicable)				
CPUC Project Manager (if applicable)	3/24/15	Andrew Barnsdale		
SoCalGas/SCE Environmental Compliance Manager (if applicable)				

Prepared by: Lara Rachowicz

Date: 3/3/15

ATTACHMENT 1

SCE's Incident Report

Construction Activities, San Fernando Mission Rd and Sharp Ave. 2/17/15



Looking SE across San Fernando Mission Blvd.



Looking W along San Fernando Mission Blvd.



Looking E across Sharp Ave.



Looking N/NE from San Fernando Mission Blvd.



Looking N down E side of Sharp Ave