

IMPACT	MITIGATION MEASURE	IMPLEMENTATION/ MONITORING METHOD	RESPONSIBLE PARTY	IMPLEMENTATION SCHEDULE
<b>AESTHETICS</b>				
Decommissioning after gas recovery would involve increased construction activities that will be visible to the public.	4.1-1. Initial landscape screening of the Main Facility and East Sites shall be provided where any significant earthworks may be undertaken during decommissioning that may be seen by the public <b>except as it conflicts with biology mitigation measures in Section 4.4</b> . The screening shall be installed where no screening exists and shall include at least three rows of shrubs or small trees, which will screen views from typical passenger cars on public streets. These landscaping screens shall be maintained until the SCG and the new owner(s) have completed the sale and transfers.	Plant appropriate species of screening shrubs or trees along roadway. CPUC verify trees planted.	SCG and new property owner.	Pre-demolition, during decommissioning, and prior to completion of sale and transfer of property.
Decommissioning after gas recovery would involve increased construction activities that will be visible to the public.	4.1-2. Physical screening of individual lots shall be provided during decommissioning of wells and removal of all physical facilities, leaving a clear and clean site.	Erect fencing and/or other screening-type device that will shield construction work from public view. CPUC verify screening installed.	SCG	Prior to decommissioning activities.
<b>AIR QUALITY</b>				
Abandonment of the 25+ wells in the Main Facility could result in an increase in air emissions.	4.3-1. SCG shall take full responsibility for compliance with all SCAQMD and City of Montebello regulations and permit conditions regarding air emissions throughout the decommissioning. If SCG sells the MGSF or any facilities thereof, the transfer shall be conditioned so that the new owner(s) accept all approved and confirmed procedures and requirements set forth in the facility's permits and shall have sufficient financial assets set aside for such implementation and completion. If for any reason, the new owner(s) fails to perform such measures, SCG shall be	Define and implement controls of odors and dust; submit control plan to CPUC. Use of Best Management Practices (BMPs) shall include the following: watering of construction areas, covering with tarps.	SCG in cooperation with SCAQMD and City of Montebello.	During decommissioning activities.

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	<p>responsible for such implementation throughout decommissioning.</p> <p>SCG shall define and implement controls of odors and dust during decommissioning, degassing of the field, and abandonment of wells. The control shall be prepared in conjunction with the SCAQMD and City of Montebello, and approved by the SCAQMD prior to implementing the project. Controls of odors arising from H<sub>2</sub>S and hydrocarbons may include activated carbon or incineration by catalytic oxidizer/combustors as allowed by the SCAQMD and the City of Montebello Fire Department.</p>			
<b>BIOLOGICAL RESOURCES</b>				
<p>Decommissioning of facilities and abandonment of wells on the Main Facility site would generate prolonged disturbing activities on the upper and middle terraces of the site and could adversely affect the relatively natural habitats along the western perimeter and buffers of the site.</p> <p>The Main Facility and East Site provide potential habitat for important plants. Even limited disturbance and earthwork could encounter these plants during their growing season, destroy seeds, or further isolate them from other stands. With uncertainty of no impact, potential losses of these</p>	<p>4.4-1 To ensure that the interests of the USFWS, CDFG and other relevant resource agencies are adequately addressed in the future focused or protocol surveys will be conducted not more than one year prior to any ground disturbing activities. For the purposes of this analysis the baseline condition is assumed to be the currently permitted levels of operation. Consultation will take place with USFWS and CDFG prior to implementation of these mitigation measures.</p> <p>Mitigation shall compensate for adverse effects of other activities discussed below. Impact-reducing measures to be undertaken prior to or during decommissioning shall include:</p> <p>a. Baseline surveys of special-status and</p>			

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<p>plants represent a significant effect, which requires mitigation to less-than-significant levels.</p> <p>The more natural habitats on the East Site would be affected only by the abandonment of two wells and some minor pipework.</p> <p>The East Site could represent an element in the distribution of gnatcatchers and migratory patterns of various hawks and owls in the areas, especially during changes between winter and summer.</p> <p>There is potential for effects to four special status species on the East Site from decommissioning.</p>	<p>sensitive species identified during the May 10, 2001 field visit shall be conducted by SCG no later than June 15, 2001 for plant species and August 30, 2001 for wildlife species. In the event that plant protocol surveys cannot be implemented by June 15, 2001 because of seasonal timing, they will be completed no later than June 15, 2002. Future surveys may require alteration of the species list in consultation with USFWS and CDFG.</p> <p>b. Protocol surveys shall be conducted for special-status and sensitive species having suitable habitat as identified by CDFG during a site visit on May 10, 2001. The surveys shall be conducted during the appropriate season, and not more than one year prior to the first ground-disturbing activity, the surveys shall clearly identify the precise locations, presence, and degrees/types of use of the species. The surveys shall strictly adhere to all current (at implementation) protocols established or regulated by the USFWS and the CDFG. The USFWS and CDFG shall be contacted prior to commencing the surveys for the purpose of defining protocol requirements. The USFWS and CDFG shall be provided copies of the survey results for the purpose of assessing the need for mitigation and the appropriate mitigation required for the resource type and extent of potential impact.</p> <p>c. Isolation and demarcation of special-status plant populations or designated</p>	<p>a. Conduct protocol surveys per USFWS and CDFG guidelines during appropriate season; submit reports to USPWS, CDFG, and CPUC.</p> <p>b. Stake out areas of special-status plant or wildlife species to be avoided during decommissioning activities. CPUC monitor verify staking.</p>	<p>a. SCG in cooperation with CDFG and USFWS. Surveys to be conducted by a qualified wildlife biologist.</p> <p>b. SCG with the assistance of a qualified biologist.</p>	<p>a. Prior to decommissioning activities.</p> <p>b. Prior to decommissioning activities.</p>

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	<p>special-status species wildlife habitat prior to and during decommissioning.</p> <p>d. Within the decommissioning area, collection of seeds and seedlings for dominant species of sensitive vegetation communities (i.e., coast sage scrub, riparian) that may require restoration. These seeds and seedlings may be suitable for protection and development of nursery stocks by others for relocation and replanting on MGSF sites not planned for development or other lands approved by USFWS and CDFG. Seed collection will not be used for restoration of rare plants. High quality top soil from the impacted site should be segregated and used for any future re-planting efforts.</p> <p>e. Provision of suitable gnatcatcher and horned lizard nesting sites on other lands during the decommissioning period. In general, this type of mitigation has not proven highly successful and should not be relied upon as the sole method of offset or mitigation.</p> <p>f. Replacement planting of listed trees at replacement ratios determined suitable and appropriate, in consultation with the Cities of Montebello and Monterey Park and the County of Los Angeles.</p> <p>SCG shall conduct surveys for special-status plant species during the appropriate flowering period prior to surface-disturbing activities.</p> <p>If impacts to endangered, threatened or special status plants and project impacts</p>	<p>c. Collect seeds of special-status plants to be propagated by a nursery for re-planting in suitable areas in the vicinity of the project site.</p> <p>d. SCG include in decommissioning schedule and plans; SCG submit to CPUC.</p>	<p>c. SCG and with the assistance of a commercial nursery and/or CCC.</p> <p>d. SCG</p> <p>e. SCG with the assistance of a qualified biologist.</p>	<p>c. Prior to decommissioning activities.</p> <p>d. Prior to decommissioning activities.</p>

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	<p>to plants cannot be avoided, mitigation alternatives and plans shall be designed based on the specific requirements of the species and habitat involved. The plan shall include a combination of on-site and off-site mitigation:</p> <p>a. On-site: Partial avoidance, seed collection with re-seeding, or acquisition of seedlings from a nursery and/or replacement of stockpiled soil, as directed by USFWS and CDFG. Any on-site re-planting plans shall include monitoring for a minimum of five years to determine success of re-seeding and habitat creation. The mitigation shall be implemented prior to surface disturbance of listed plants.</p> <p>b. Off-site: Land acquisition or use of a conservation easement over an existing population of the special-status species that the project eliminated (minimum 1:1 replacement). Establishment of a management endowment as necessary to provide for long-term management of the population.</p>	<p>e. Include in decommissioning schedule and plans; submit to CPUC.</p> <p>f. Prepare a Vegetation Management Plan to plant and monitor replacement trees; submit to CPUC.</p> <p>a. After field surveys are completed, prepare Vegetation Management Plan for seed</p>	<p>f. SCG with the assistance of a qualified biologist.</p> <p>a. SCG with the assistance of a qualified biologist and/or nursery or CCC.</p>	<p>e. Prior to decommissioning activities.</p> <p>f. During and after decommissioning activities until trees are established without requiring regular watering (3 years).</p>

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		<p>collection of special-status plants for propagation and re-planting on-site if possible. Submit plan to CPUC, USFWS, and CDFG.</p> <p>b. Establish off-site mitigation by either land acquisition or conservation easement for re-establishment of special-status plant species. Review plans with CPUC.</p>	<p>b. SCG and new property owner in cooperation with CDFG and USFWS.</p>	<p>a. Prior, during and after decommissioning activities for the specified monitoring period agreed to with CDFG and/or USFWS.</p> <p>b. Prior to completion of sale (in consultation with USFWS, CDG.)</p>
<p>Development construction on the Main Facility site and the East Site would adversely affect the mulefat scrub habitat and a few remaining sycamores (riparian species).</p>	<p>4.4-2 Any modifications to the Mulefat/willow and sycamore riparian habitat on the MGSF sites shall be coordinated with the USACOE and CDFG to determine the extent, if any, of their jurisdiction for riparian or wetland habitats. Any identified jurisdictional habitats would be isolated and demarcated for protection during the decommissioning and provided for in the habitat restoration program. Such habitat replacement (estimated at less than 1 ac) would be coordinated and added to the measures for Checklist Question a), above.</p>	<p>Stake out riparian habitat for avoidance during decommissioning activities. CPUC verify staking prior to disturbance.</p> <p>If any riparian habitat is identified as impacted by decommissioning activities, a habitat restoration program shall be developed and implemented for replacement.</p> <p>CPUC verify restoration and success criteria were met.</p>	<p>SCG in cooperation with US Army Corps and CDFG.</p>	<p>Prior and during decommissioning activities. Complete restoration prior to sale.</p>
<p>Development construction on the Main Facility site and the East Site would adversely affect the mulefat scrub habitat and a few remaining</p>	<p>4.4-3 Any riparian vegetation (willow) affected in the decommissioning due to remediation activities shall be transplanted directly or held for nursery stock development. Mitigation measures</p>			

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<p>sycamores (riparian species). As that habitat and species is considered an indicator for riparian habitat, removal would be a significant impact without mitigation.</p> <p>LSA Associates conducted a jurisdictional wetland delineation for all Project sites on January 5, 2001. This delineation effort determined that 0.10 acre of Waters of the U.S. exist between the Main Facility and the East Site.</p>	<p>during decommissioning shall include:</p> <p>a. Avoidance or minimization of impacts from decommissioning and development construction to any wetland vegetation.</p> <p>b. Development and implementation of wetland mitigation and monitoring plan to compensate for any loss of wetland vegetation cover.</p> <p>c. Replacement compensation at a mitigation ratio to replace or exceed any loss of habitat and functional value of the wetland habitat.</p> <p>If USACOE takes jurisdiction on any site within the MGSF property, the Section 404 permit approval action, if such were required, would most likely trigger a Section 7 consultation between the USACOE, USFWS, and CDFG regarding the special status plants, coastal California gnatcatcher, and the horned lizard (the impacts would be mitigated through measures discussed above).</p> <p>If protected species have established nests or are using the Main Facility and East Site during migration, well abandonments shall be undertaken when young have fledged or migrating birds have left unless noise levels are within levels acceptable to CDFG and/or USFWS. Migrations would be expected for wildlife species or adequate similar habitat may be available to allow the special status species (e.g. gnatcatcher) to migrate to areas, which would either have visual screening or be sufficiently</p>	<p>a. Stake areas to be avoided during decommissioning.</p> <p>b. Produce wetland MMRP if required. Submit to CPUC and COE.</p> <p>c. Incorporate mitigation replacement ratio into MMRP; submit to CPUC. Conduct Section 7 consultation with USFWS, if required. Report to CPUC.</p>	<p>a. SCG</p> <p>b. SCG with assistance from a qualified wetland expert.</p> <p>c. SCG in cooperation with US Army Corps and USFWS.</p>	<p>a. During decommissioning activities.</p> <p>b. During decommissioning activities.</p> <p>c. Prior and during decommissioning activities.</p>

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	remote to isolate critical activities of the special-status species.			
Decommissioning could generate impacts on the East Site by temporary disturbance of California gnatcatcher or the horned lizard from noise and human presence associated with demolition, salvaging, or remediation activities. This could result in temporary displacement and possibly nest or territory abandonment during the nesting and rearing seasons, or harassment and physical harm.	<p>4.4-4. Suitable habitat for the coastal California gnatcatcher (coastal sage scrub) is available on the East Site, and one gnatcatcher was identified through vocalization to be present on the site during the September 2000 reconnaissance-level survey. In addition, CDFG confirmed on May 10, 2001 that there is at least one pair of gnatcatchers on the East Site. A total of 4.94 acres of coastal sage scrub was identified predominantly on the East Site. It is unknown at this time how many acres will be affected either directly or indirectly by the project.</p> <p>When the East Site is subjected to disturbance or decommissioning noise during the site abandonment and salvaging operation, the following impact avoidance measures shall be followed if there are nesting gnatcatchers on the site:</p> <p>a. Construction activities will be scheduled for the nonbreeding season of the California gnatcatcher (August 31 through February 14) to avoid disturbance of nesting birds (provided that the habitat is not totally removed).</p> <p>b. During abandonment, salvaging, and/or site remediation activities, a biologist acceptable to the USFWS will be on site during brush clearing within coastal sage scrub habitat. The biologist will have the authority to stop</p>	<p>a. Produce construction schedule in identified habitat areas so as not to interfere with breeding season for California gnatcatcher; submit to CPUC, USFWS, and CDFG.</p>	<p>a. SCG in cooperation with CDFG and USFWS.</p> <p>b. SCG with the</p>	<p>a. Prior to decommissioning activities.</p>



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	<p>construction activities when the potential for “take” of a gnatcatcher may occur. Such incidences of “take” could be physical harm, killing, harassment, capturing, pursuing, or collecting individual birds. This section could be eliminated if the Project obtains a Section 10(a) Incidental Take permit.</p> <p>c. Earthmoving or demolition equipment will be confined to the narrowest practicable corridor. Waste dirt or rubble will not be deposited within coastal sage scrub vegetation. The area of vegetation removal, trimming, or clearing will be the smallest practicable area to achieve the desired goal of the demolition, salvaging, or site remediation activity.</p> <p>d. Noise associated with decommissioning will be attenuated to less than 65 decibels measured from the edge of the habitat as defined by a timely protocol survey. Attenuation will include use of hospital grade mufflers, temporary sound walls, and work outside of the breeding season, or other acceptable noise reducing measures acceptable to USFWS and CDFG.</p> <p>A wildlife biologist shall conduct preconstruction surveys for California gnatcatchers in the coastal sage scrub habitat. The surveys shall be conducted under a Section 10(a)(1)(A) permit to determine occupancy and to establish a no-disturbance buffer zone around active nest/breeding sites. The surveys shall be conducted in accordance with</p>	<p>b. Coordinate with biologist to act as a monitor during activities in identified habitat areas. Provide monthly monitoring reports to CPUC.</p> <p>c. Stake out areas to be avoided by construction equipment during demolition activities. CPUC verify staking.</p> <p>d. Conduct preconstruction surveys during breeding season for California gnatcatcher; submit reports to CPUC and USFWS.</p>	<p>assistance of a qualified biologist.</p> <p>c. SCG</p> <p>d. SCG with assistance of a qualified biologist.</p>	<p>b. During decommissioning activities.</p> <p>c. Prior to and during decommissioning activities.</p> <p>d. Preconstruction during breeding season.</p>

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	<p>the Coastal California Gnatcatcher (<i>Polioptila californica californica</i>) Presence/Absence Survey Guidelines, February 28, 1997 (USFWS 1997).</p> <p>Nine surveys shall be conducted during the nonbreeding season (between August 31 through February 14) or six surveys will be conducted during the breeding season (between February 15 through August 30). Individual surveys will be conducted at least two weeks apart during the nonbreeding season or at least one week apart during the breeding season.</p> <p>If nest sites, eggs, breeding couples, or fledglings are identified on the site, the following step shall be taken:</p> <p>a. Within 45 days following the field surveys, the permitted wildlife biologist will submit a report of findings to the USFWS and the CDFG. The report will contain:</p> <ol style="list-style-type: none"> <li>1. Map showing the location of the survey area</li> <li>2. Names of all biologists and associated personnel with reference to their section 10(a)(1)(A) permit number</li> <li>3. A complete description of survey methods, including number of acres surveyed per biologist per hour and the number of acres surveyed per day per biologist. In addition, the number and dates of surveys, the start and stop times of surveys, survey route delineated on maps, temperature and</li> </ol>			

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	<p>weather conditions, and the frequency of taped delineations</p> <p>4. Written and mapped qualitative descriptions of plant communities (including dominant species and habitat quality) on and adjacent to the survey area</p> <p>5. Number, age (adult, independent juvenile, dependent juvenile, recently fledged juvenile, nestling, unknown), sex of all coastal California gnatcatchers, and color band information, if any. Data will be plotted on 1:24,000 and 1:200 scale maps of the survey area</p> <p>b. The permitted wildlife biologist will meet with the USFWS and the CDFG to review the reports and to formalize appropriate measures to reduce or eliminate a “take” of the California gnatcatcher.</p> <p>Depending on the outcome of the breeding or nonbreeding surveys, such measures to avoid “take” of coastal California gnatcatcher shall include:</p> <p>a. Flagging and marking known nest sites</p> <p>b. Prohibition of demolition, salvaging, and site remediation within specified distances (500 – 1,000 feet) from a nest site between February 15 and August 30.</p> <p>SCG should coordinate the results of the protocol surveys with the USFWS and CDFG, and shall develop appropriate strategies to compensate for the loss of</p>	<p>a. Submit report of surveys to USFWS and CPUC.</p>	<p>a. SCG with assistance of qualified biologist in cooperation with USFWS.</p>	<p>a. Within 45 days following field surveys.</p>

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	<p>sage scrub habitat during decommissioning. Removal of coastal sage scrub shall be compensated at a ratio of 1:1 for unoccupied habitat on the Main Facility and 3:1 on the East Site. Depending on whether the USACOE exerts jurisdiction, either a Section 7 consultation will be initiated or Section 10 permit application will be filed with the USFWS by SCG. The exact means of compensation would be coordinated with the appropriate agencies, but could include:</p> <p>a. Development of an on-site HCP or participation in an adjacent HCP or NCCP program.</p> <p>b. Restoration of on-site or nearby disturbed areas of coastal scrub.</p> <p>c. Preservation of coastal sage scrub vegetation within the East Site and/or within established coastal sage scrub vegetation on nearby sites and incorporation of appropriate conservation easements.</p> <p>d. Conduct Section 7 consultation between USFWS and USACOE.</p>	<p>b. Arrange meeting with USFWS and CPUC for report review.</p> <p>Determine appropriate mitigation measure for avoidance of take for California gnatcatcher; submit to CPUC, USFWS.</p>	<p>b. SCG with the assistance of a qualified biologist.</p> <p>SCG with the cooperation of USFWS.</p>	<p>b. After survey report is completed and submitted to USFWS and CPUC.</p> <p>Prior to and during decommissioning activities.</p>
<p>Future development of the MGSF properties after their sale could result in impacts to biological resources.</p>	<p>4.4-5. To ensure compliance with biological resource mitigation measures that are required prior to or during development of the sold MGSF properties the following notifications will be made by SCG:</p> <p>a. Notify USFWS and CDFG with the buyer's name and information related to</p>	<p>Submit detailed report of notification and method of notification to CPUC, USFWS, CDFG, and City of Montebello</p>	<p>SCG</p>	<p>Prior to completion of each sale (in consultation with USFWS, CDFG, City of Montebello.)</p>

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	<p>the sale of the MGSF properties.</p> <p>b. Notify the buyer and the City of Montebello of the MGSF of the presence of sensitive habitats and species that may not be disturbed without prior written notification to the USFWS and CDFG (at least 60 days prior to surface disturbance) or of any other mitigation measure conditions that apply prior to and after sale of the MGSF properties.</p>			
<p>Decommissioning and future development of the MGSF properties could impact biological resources.</p>	<p>4.4-6. All of the preceding measures shall be coordinated through SCG's development of a biological resources mitigation and monitoring plan.</p>	<p>On-going coordination with and reporting to CPUC, USFWS, and CDFG.</p>	<p>SCG</p>	<p>Prior to decommissioning activities.</p>
<b>CULTURAL RESOURCES</b>				
<p>During gas recovery and decommissioning, some excavations may occur around older oil, gas, and monitoring wells that could disturb undocumented archaeological materials, most likely at the East Site and perhaps some of the isolated Townsite lots primarily east of Montebello Blvd.</p>	<p>4.5-1. The following measure should be used prior to commencement of decommissioning activities:</p> <p>Any structure of 50 years or older shall be reviewed and assessed as to its historic significance.</p>	<p>Verify historic importance of structures and debris prior to and during Project actions; submit report to CPUC.</p>	<p>SCG</p>	<p>Prior to decommissioning activities.</p>
<p>Due to the increased amount of subsurface activity during decommissioning, undocumented paleontological resources may be encountered and disturbed or destroyed. The highest potential for resource encounters exists at the Main Facility, where potentially</p>	<p>4.5-2. There are no known archaeological or paleontological resources at the Project site. There is no known sacred use of the Project site. Since the possibility exists for disturbing unknown cultural resources, a qualified archaeologist shall intermittently monitor the Project areas. Pursuant to Section 21083.2 (I) of the Public Resources Code, in the event any archaeological,</p>	<p>Verify that known and unknown archaeological and paleontological resources and human remains are not destroyed; report to CPUC.</p>	<p>SCG with the assistance of a qualified archaeologist.</p>	<p>During decommissioning activities.</p>

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<p>fossiliferous materials may be at the surface and not yet buried by other fills or destroyed by typical soil processes.</p>	<p>paleontological, or historic resources or human remains are encountered during site preparation or construction, all work in the immediate vicinity of 20 meters shall cease and a qualified archaeologist or historian will be consulted to evaluate the find.</p>			
<b>GEOLOGY AND SOILS</b>				
<p>Activities during decommissioning may generate some adverse effects on the geological resources and indirectly on the related context of the West Montebello Field, and these potentially significant effects shall be monitored and, if necessary, mitigated, and compensated for.</p>	<p>Mitigation shall be undertaken during, and perhaps after the storage gas recovery, decommissioning, and transfer of MGSF assets. Mitigation measure shall fall into the following categories.</p> <ul style="list-style-type: none"> <li>• Immediate Measures (2001-2003)</li> <li>• Pre-Transfer Measures (2003-2006)</li> <li>• Transfer Measures (2005-2008)</li> <li>• Ongoing/Post-Transfer Measures (Post-2008)</li> </ul> <p>Immediate Mitigation-Gas and Wells</p>	<p>Prepare a comprehensive MGSF Surface Gas Monitoring Plan (SGMP) that defines the necessary details, logistics and technical methodologies involved in implementing the mitigation measures, as needed, both on a lot-by-lot basis and MGSF-wide. The SGMP shall be subdivided into Immediate/ Ongoing, Pre-Transfer, Transfer, and Post-Transfer activities.</p> <p>The SGMP shall be reviewed, modified as needed, and approved by the City of Montebello, the DOGGR, and the CPUC prior to implementation.</p> <p>Immediate measures shall develop and organize data and analyses to</p>	<p>SCG shall prepare the SGMP in consultation and cooperation with the City of Montebello, DOGGR, and the CPUC. Consultation and cooperation shall include close coordination, document review, comment/ response, appropriate modification, and approval unless otherwise defined in the SGMP or a program-specific MOU.</p> <p>SCG shall initiate and complete these Immediate activities</p>	<p>Schedule for submittal of the initial SGMP shall be at the discretion of SCG before decommissioning</p> <p>All review comments and suggested modifications shall be submitted within 90 days of receipt of the initial SGMP. Approval shall be provided within 30 days after resolution of review comments and modifications.</p> <p>SCG shall begin these</p>

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	<p>Measures are proposed for mitigation and recommended for all existing wells, including existing abandoned, operating, monitoring, inoperative, and venting in order to assure the future owner(s), occupants, and residents of continued safety for the area above the gas storage zone. Thorough documentation of previous and Project works related to the wells shall be provided for the current and future owners and the City of Montebello.</p> <p>SCG has well files that contain information for all active wells that engineers refer to whenever problems occur with a well. Regular monitoring of the existing wells, as detailed below, will provide the highest and best method for detecting potential leaks and safety issues. SCG shall assemble a well-organized file for all wells and make available such files to the City of Montebello within two weeks of their request during the project, shall quarterly update the well/facility file, and shall deliver the complete file to the City or a designated representative 90 days before formal transfer of any property to a subsequent owner.</p> <p>Immediate Field Monitoring</p> <p>Current low-level operations and relatively stable storage conditions should have allowed the Storage Zone and related pathways to stabilized and should form a good baseline condition. Immediate field testing of the baseline conditions is vital for understanding any subsequent changes with regard to gas</p>	<p>determine which sale lots or other adjacent areas have shallow gas detections, to determine the sources of the shallow gas detections, and to develop specific monitoring and remediation methods and techniques to provide a proper level of safety for future owners. The following Immediate activities shall be a part of the SGMP. Assemble all records, data, and reports for: wells (operating &amp; abandoned), monitoring of gas wells, soil gas surveys, gas collection and venting systems. Provide all documents to appropriate state and city agencies for review and evaluation. Determine if additional information is needed. Develop detailed monitoring plans. Conduct specific field monitoring at all then available well, gas collection and vent locations, in accordance with approved plans, to determine baseline conditions.</p> <p>The resulting data, analysis, and documentation arising from these Immediate activities shall be provided on request to the City of Montebello, the DOGGR, and the CPUC.</p> <p>SCG prepare well documentation and submit to new owner and a copy of transmittal letter to</p>		<p>Immediate activities when they begin the SGMP and provide data, analysis, and documentation with the initial SGMP, prior to decommissioning.</p>

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	<p>recovery and decommissioning. SCG shall undertake an immediate detailed monitoring task to establish the baseline conditions prior to initiation of gas recovery. The monitoring shall ascertain compositions, pressures, and origins of surface gas releases, determine the most probable pathways for releases to the surface, and changes for current and future near-surface gas releases.</p>	<p>CPUC.</p>		
<p>Specific well and ground monitoring practices for MGSF may be outdated.</p>	<p>4.6-1 - Monitoring Procedures and Methods. SCG shall review well and ground monitoring requirements within an urban environment as required or practiced by other agencies and states and shall develop and implement an improved monitoring program and training of staff for monitoring of the near-surface ground and wells for existing wells and foundations over abandoned wells. SCG shall review the</p>	<p>As a part of the SGMP SCG shall review well and ground gas monitoring requirements, then develop and implement in the Pre-Transfer stage an improved monitoring program; submit to CPUC and DOGGR.</p>	<p>SCG with the consultation and cooperation with DOGGR, CPUC, and the City of Montebello.</p>	<p>Prior to decommissioning activities.</p>



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	<p>findings with DOGGR and jointly determine if revisions to SCG’s monitoring program are required based on the best practices found in other areas. SCG and DOGGR shall provide their findings and determinations to the CPUC. SCG shall monitor all existing active, inactive, and abandoned wells at intervals as determined by the above study throughout the decommissioning period and until transfers to the new owner(s) are completed.</p> <p>SCG in concert with DOGGR and the City of Montebello shall develop a more aggressive monitoring systems for abandoned well gas for the period of decommissioning; the systems shall use some means of concentrating gases released from the well within 2 ft of the casing and shall be installed at the time of the abandonment of all wells to be abandoned following approval of the proposed actions. SCG shall continue to conduct monitoring with qualified and trained staff on all wells at current intervals with provisions for additional and reduced monitoring depending on monitoring results.</p>			

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<p>Isolated wells through the Storage Zone and Shallow Zones may be due for inspection or should be inspected for documentation purposes.</p>	<p>4.6-2 - Active Well Monitoring. All isolated wells passing through the Storage Zone and Shallow Zones shall be re-inspected and documented to assure proper documentation of facilities, locations, surrounding land uses, operating capability, and usefulness during the decommissioning period.</p>	<p>As a part of the SGMP SCG shall develop a plan and schedule for re-inspection of all isolated wells, implement plan, and submit plan implementation report to CPUC and DOGGR.</p> <p>Develop a plan and schedule for re-inspection of all isolated wells; implement plan. Submit plan and implementation report to DOGGR and CPUC.</p>	<p>SCG with the consultation and cooperation with DOGGR, CPUC, and the City of Montebello.</p>	<p>Prepare prior to decommissioning and implement during decommissioning activities.</p>
<p>Slant-drilled wells on Main Facility may require special monitoring to be specifically effective.</p>	<p>4.6-3 - Monitoring of Main Facility Site Cluster. SCG shall provide special monitoring measures for the cluster of slant-drilled wells within the Main Facility site. The cluster of slant-drilled wells in the Main Facility site shall require prolonged abandonment and monitoring in close proximity. SCG shall prepare a special process and aggressive monitoring program for the cluster abandonment. Consideration shall be given for automated monitoring of wells before and after abandonment of individual wells during the overall decommissioning period.</p>	<p>As a part of the SGMP SCG shall develop specific monitoring measures for slant wells on Main Facility, implement plan, and submit plan implementation report to CPUC and DOGGR.</p>	<p>SCG with the consultation and cooperation with DOGGR, CPUC, and the City of Montebello.</p>	<p>Prepare prior to decommissioning and implement during decommissioning activities.</p>
<p>Michael Collins Circle has a special venting system that requires regular monitoring.</p>	<p>Mitigation Measure 4.6-4 - Michael Collins Circle Venting System. The venting system has been operating successfully for more than a decade. SCG shall provide monitoring of the gas venting system in concert with abandoned wells in the Circle area as well as the nearest wells within or adjacent to the Circle area. Consideration shall be given to automated monitoring within the venting exhaust system. Exhaust gases from and the operations</p>	<p>Continue monitoring of Michael Collins Circle and provide quarterly reports to DOGGR, CPUC, the City of Montebello, and the SCAQMD.</p>	<p>SCG with the consultation and cooperation with DOGGR, CPUC, and the City of Montebello, SCAQMD, and other appropriate agencies</p>	<p>Prior to, during and after decommissioning activities.</p>

IMPACT	MITIGATION MEASURE	IMPLEMENTATION/ MONITORING METHOD	RESPONSIBLE PARTY	IMPLEMENTATION SCHEDULE
	<p>of the venting system shall be monitored, documented, and reported on a frequent basis during the degassing. Quarterly reports shall be provided to relevant agencies.</p>			
<p>The OII Landfill has wells on the Main Facility of the MGSF that require ongoing monitoring.</p>	<p>4.6-5 - OII Wells. Many OII wells are located outside of the main landfill parcel and are monitored by OII under the guidance of the EPA. SCG shall also monitor the existing OII wells within the Main Facility site during the degassing and decommissioning period. SCG shall seek to acquire OII Landfill information on the same wells and other gas-related information for any OII wells. Conditions in the OII wells shall be correlated with degassing and other related decommissioning activities and reported to the DOGGR, operators at OII Landfill, City of Montebello, and CPUC.</p>	<p>Coordinate with New Cure regarding monitoring of existing OII wells on the Main Facility. Continue to monitor. Submit reports to DOGGR, City of Montebello, and CPUC.</p>	<p>SCG in cooperation with DOGGR, OII Landfill (New Cure), City of Montebello, and CPUC.</p>	<p>During degassing and decommissioning activities.</p>
<p>Potential impacts are associated with exposure of populations and structures to accumulation of soil gas in residential areas. If soil gas accumulates inside or under buildings or infrastructure systems, the threat health hazards, fire, or explosion exists. Various methods exist for detection and removal of soil gas, thus minimizing the potential for accumulation inside structures. Without mitigation, this gas accumulation would result in a significant adverse impact. Since the CPUC and SCG actions would take place</p>	<p>4.6-6 - Previously Abandoned and Leaking Wells. SCG shall conduct a more intensive documentation and monitoring program for all wells previously reported with detectable gas levels and foundation margins over previously abandoned and now covered wells. Monitoring may be reduced or intervals increased when sufficient results indicate no further gas releases have occurred.</p>	<p>As a part of the SGMP, SCG shall develop specific measures to implement an intensive documentation and monitoring program, and submit reports to DOGGR, CPUC, the City of Montebello, and the SCAQMD.</p>	<p>SCG with the consultation and cooperation with DOGGR, CPUC, and the City of Montebello.</p>	<p>During decommissioning activities.</p>

IMPACT	MITIGATION MEASURE	IMPLEMENTATION/ MONITORING METHOD	RESPONSIBLE PARTY	IMPLEMENTATION SCHEDULE
<p>before realization of risks in the future, measures shall be taken during the Decommissioning period, before transfer to subsequent owners.</p>				
<p>Abandoned wells should be subject to a specialized monitoring program.</p>	<p>4.6-7 - Specialized Monitoring of Wells. SCG shall develop gas monitoring probes and portable hoods and monitor selected representative abandoned wells during the Immediate and later phases. Monitoring shall provide means of direct testing of gases, sampling of gases, and pressure measuring of gases in inches of water column. This monitoring shall be continued and upgraded based on monitoring results throughout the decommissioning period and use the same for monitoring of newly abandoned wells until lands are transferred to the new owner(s).</p>	<p>As a part of the SGMP, SCG shall select representative abandoned wells for a specialized monitoring program, implement program, and submit plan and reports to DOGGR and the CPUC.</p>	<p>SCG in consultation and cooperation with DOGGR, OII Landfill (New Cure), City of Montebello, and CPUC.</p>	<p>Prepare plan prior to decommissioning and implement during immediate and later decommissioning phases.</p>
<p>The presence of soil gas should be established during the decommissioning process.</p>	<p>4.6-8 - Ground Gases. SCG shall develop and implement a soil gas survey on a 1000ft-grid (or shorter intervals) over the entire Storage Zone and individually for each parcel in the proposed Project area to determine the presence or absence of soil gas. If gas is identified from the Storage Zone, a supplemental monitoring program shall be established, and the pathway for release of the gas shall be established. An independent specialist shall review the monitoring program procedures in advance to determine the adequacy of the program and any supplements. In addition, all monitoring records should be reviewed to delineate any possible gas leaks in the area identified by the testing program.</p>	<p>As a part of the SGMP, SCG shall develop, and implement if necessary, a soil gas survey and a supplemental monitoring program for ground gas; submit plan and report to DOGGR, the CPUC, and the City of Montebello.</p>	<p>SCG in consultation and cooperation with DOGGR, OII Landfill (New Cure), City of Montebello, and CPUC, and with the assistance of an independent ground gas specialist licensed by the State of California as a Professional Engineer (PE) or Registered Geologist (RG).</p>	<p>Prepare plan prior to decommissioning activities and implement during decommissioning as necessary.</p>

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<p>Storm drains may act as collectors for near-surface gas migration due to their shallow embedment and open construction.</p>	<p>4.6-9 - Storm Drain Monitoring. SCG shall establish and implement a monitoring process and technique for at least four storm drains (e.g., one under Howard and one under Jefferson). Considerations shall be given for automated monitoring of the storm drains if manual system (i.e., a suitable flame or photo ionization detector [FID/PID]) detect thermogenic gases in storm drains.</p>	<p>As a part of the SGMP SCG shall establish and implement a monitoring process for storm drains, and submit plan and report of monitoring to the CPUC and the RWQCB..</p>	<p>SCG in consultation and cooperation with DOGGR, OII Landfill (New Cure), City of Montebello, and CPUC.</p>	<p>Prepare plan prior to decommissioning activities and implement during decommissioning.</p>
<p>Potential impacts are associated with exposure of populations and structures to accumulation of soil gas in residential areas. If soil gas accumulates inside or under buildings or infrastructure systems, the threat health hazards, fire, or explosion exists. Various methods exist for detection and removal of soil gas, thus minimizing the potential for accumulation inside structures. Without mitigation, this gas accumulation would result in a significant adverse impact. Since the CPUC and SCG actions would take place before realization of risks in the future, measures shall be taken during the Decommissioning period, before transfer to subsequent owners.</p>	<p>4.6-10 - Gas Controls and Remediation. For well sites where significant processed gas is detected (&gt;100 ppm), SCG shall immediately undertake additional monitoring and with confirmation shall develop and implement a gas recovery and venting system. All venting shall be thoroughly monitored and documented for future use.</p>	<p>As a part of the SGMP SCG shall establish and implement monitoring and documentation according to current EPA and DOGGR standards. Submit plan and schedule for monitoring to SCAQMD, DOGGR, and the CPUC.</p>	<p>SCG with the consultation and cooperation with DOGGR, CPUC, SCAQMD and the City of Montebello.</p>	<p>During decommissioning activities.</p>
<p>All monitoring records should be reviewed for any necessary modification prior to transfer of property.</p>	<p>4.6-11 - Pre-Transfer Measures. Prior to transfer of any MGSF lands and after at least 50% of the available cushion gas has been recovered, SCG shall compile,</p>	<p>The Pre-Transfer measures shall evaluate the effectiveness of the Immediate measures and determine what other monitoring</p>	<p>SCG in consultation and cooperation with DOGGR, OII</p>	<p>Obtain approval of reports at least 60 days prior to transfer of MGSF properties.</p>

IMPACT	MITIGATION MEASURE	IMPLEMENTATION/ MONITORING METHOD	RESPONSIBLE PARTY	IMPLEMENTATION SCHEDULE
	<p>review, and evaluate all documentation, reviews, and monitoring results. During this later phase of gas recovery (2003-2006), modifications of training, monitoring, surface gas programs, and needs for near-surface gas venting systems may be required and useful for the remainder of the Project period. During this phase, currently active wells may be abandoned as unneeded for final gas recovery.</p>	<p>or remediation methods and techniques, if any, are needed to effectuate transfer of individual lots. SCG shall assemble all new records, data and reports from specific monitoring tasks. Provide all documents to appropriate state and city agencies for review and evaluation. Evaluate information and determine if additional data collection is needed to address specific issues identified. Conduct additional investigations, as necessary, to quantify issues identified. Submit reports to DOGGR and CPUC.</p>	<p>Landfill (New Cure), City of Montebello, and CPUC.</p>	
<p>The immediate monitoring program may require an upgrade.</p>	<p>4.6-12- Monitoring Upgrading. Agency staff or representatives shall review and evaluate the immediate monitoring program and any upgrades and develop improvements as needed for the remainder of the Project period and prior to Transfer of MGSF lands. Monitoring frequency may be changed to reflect at least two years of monitoring results. Results of the evaluation shall be provided to the CPUC.</p>	<p>SCG shall review current monitoring program, assess the effectiveness, provide supporting data, and recommend upgrades as needed. Submit report and recommendations to DOGGR, OII Landfill (New Cure), City of Montebello, and CPUC.</p>	<p>SCG in consultation and cooperation with DOGGR, OII Landfill (New Cure), City of Montebello, and CPUC.</p>	<p>Following completion of about 75% of the immediate monitoring and at least 60 days prior to transfer of MGSF properties.</p>
<p>Ground gases have risen to the surface over the gas storage area. Measures are recommended for existing ground gas systems and continued operating, monitoring, and venting of existing and supplemental</p>	<p>4.6-13 - Later Monitoring. SCG shall continue monitoring of wells, ground gas probes, storm drains, and foundations.  a. SCG shall collect representative gas samples from sources with &gt;100 ppm of methane gas and with pressures of &gt;1 in</p>	<p>SCG shall use an independent ground gas specialist, licensed by the State of California as a Professional Engineer (PE) or Registered Geologist (RG), to modify the SGMP as needed to establish Ongoing and Post-Transfer monitoring and</p>	<p>SCG shall select an independent gas specialist and prepare SGMP modifications in consultation and cooperation with DOGGR, OII</p>	<p>During the decommissioning process, and obtain approval of all reports and plan modifications at least 60 days prior to transfer of MGSF properties.</p>

IMPACT	MITIGATION MEASURE	IMPLEMENTATION/ MONITORING METHOD	RESPONSIBLE PARTY	IMPLEMENTATION SCHEDULE
<p>ground gas systems over the West Montebello Field. These measures shall assure the future owner(s), occupants, and residents of continued safety for the area above the gas storage zone.</p>	<p>(water).</p> <p>b. SCG shall review requirements for wells in urban environments as practiced in other cities and states and develop if necessary an improved monitoring and venting design and process to reflect the greater reduction of risk of ground gases. The urban venting requirements shall be independently reviewed by specialists under contract to the CPUC or its representative without any past, existing, or anticipated relationship with SCG or its affiliates.</p> <p>c. SCG shall assure easy access to monitoring wells and probes, assess at least three different depths of vadose gases down to 50 ft, and allow sampling and monitoring of gas composition and pressures (in inches of water, not 10s, 100s, or 1000s of psi) and of regional groundwater levels if within 50 ft of the surface. Additional monitoring shall be required below any perched water table found during drilling for monitoring wells or probes.</p> <p>d. The venting and monitoring well designs shall provide for monitoring systems within the vicinity of wells and sites for optional venting wells if required in the future which shall be accessible for additional monitoring and installation of venting systems.</p> <p>e. SCG shall document existing venting systems, installation of new ground gas monitoring systems, and if needed venting of ground gases during the decommissioning period and for two years thereafter. Documentation shall be</p>	<p>remediation methods and techniques (including plans and designs), and reporting requirements that shall assure the future owner(s), occupants, and residents of continued safety for the area above the gas storage zone. If applicable this shall include development of improved monitoring and venting systems. During the decommissioning process, prepare and submit periodic status reports to the appropriate agencies for approval.</p>	<p>Landfill (New Cure), City of Montebello, and CPUC.</p> <p>Reports, monitoring data, and other documentation shall be provided to the new owner(s), the City of Montebello, and CPUC.</p>	

IMPACT	MITIGATION MEASURE	IMPLEMENTATION/ MONITORING METHOD	RESPONSIBLE PARTY	IMPLEMENTATION SCHEDULE
	<p>provided to the new owner(s), the City of Montebello, and CPUC.</p> <p>f. SCG shall install and operate ground gas monitoring and venting, if required, systems for all sites of more than 10,000 sq. ft throughout the decommissioning period. SCG shall monitor and provide for monitoring of ground gases at all wells and ground gas systems throughout the decommissioning period and two years after the transfer to new owner(s).</p> <p>Monitoring wells and probes shall be installed for every area of more than 10,000 sq. ft or within 100 ft of an operating well. Larger areas may require more monitoring wells, and SCG shall install sufficient wells to provide adequate monitoring of the larger areas (e.g., &gt;1 per acre). Initial monitoring wells shall be thoroughly documented and then updated as to geological units, ground water levels and other important characteristics for locating and design of additional wells, and perhaps for venting wells if required.</p> <p>g. New ground gas monitoring may indicate changes in ground gas monitoring or venting. In the event of gas levels are detected at more than 100 ppm of methane and or pressures of more than 1 inch of water, additional monitoring wells shall be immediately installed. If pressures continue for more than 72 hours or are recorded within 100ft of an existing occupied structure, venting wells shall be installed immediately. All monitoring and venting activities during decommissioning and</p>			



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	<p>two years thereafter shall be thoroughly documented, and periodic reports shall be provided by SCG to the new owner(s), CPUC, DOGGR (if appropriate), and the City of Montebello.</p> <p>Monitoring and Documentation of Project Abandonment</p> <p>h. During this phase, currently active wells may be abandoned. Such abandonment requires adequate documentation and characterization and will be supervised by DOGGR and reported quarterly to the City of Montebello and the CPUC.</p>			
<p>Potential impacts are associated with exposure of populations and structures to accumulation of soil gas in residential areas. If soil gas accumulates inside or under buildings or infrastructure systems, the threat health hazards, fire, or explosion exists. Various methods exist for detection and removal of soil gas, thus minimizing the potential for accumulation inside structures. Without mitigation, this gas accumulation would result in a significant adverse impact. Since the CPUC and SCG actions would take place before realization of risks in the future, measures shall be taken during the Decommissioning period, before transfer to subsequent</p>	<p>4.6-14 - Well Abandonment Documentation. As part of the later gas recovery and well abandonment phase, SCG shall develop and implement an adequate documentation and monitoring program for all new well abandonment. Abandonment shall be graphically documented at critical points.</p>	<p>Develop a Well Abandonment and Monitoring documentation package for each well abandoned; submit to the prospective owners, City of Montebello, the City of Monterey Park, the CPUC, and DOGGR</p>	<p>SCG in consultation and cooperation with DOGGR, OII Landfill (New Cure), City of Montebello, and CPUC.</p>	<p>During the decommissioning process, and obtain approval of all reports and plan modifications at least 60 days prior to transfer of MGSF properties.</p>

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<p>owners.</p> <p>Potential impacts are associated with exposure of populations and structures to accumulation of soil gas in residential areas. If soil gas accumulates inside or under buildings or infrastructure systems, the threat health hazards, fire, or explosion exists. Various methods exist for detection and removal of soil gas, thus minimizing the potential for accumulation inside structures. Without mitigation, this gas accumulation would result in a significant adverse impact. Since the CPUC and SCG actions would take place before realization of risks in the future, measures shall be taken during the Decommissioning period, before transfer to subsequent owners.</p>	<p>4.6-15 - Gas Characterization. During abandonment, SCG shall conduct or require monitoring of casing gas levels and pressures at three evenly spaced intervals. Within one week of completion of abandonment, SCG shall begin aggressive monitoring of casing.</p>	<p>Perform monitoring in accordance with current EPA and DOGGR standards; provide as part of the Well Abandonment and Monitoring documentation package</p>	<p>SCG in consultation and cooperation with DOGGR, OII Landfill (New Cure), City of Montebello, and CPUC.</p>	<p>During the decommissioning process, and obtain approval of all reports and plan modifications at least 60 days prior to transfer of MGSF properties.</p>
<p>The most important Project-related effect involves the continuing potential for gas migration from either the Storage Zone or Shallow Zones to the surface, as has been reported in the Project area in the past. Past experiences and lack of certainty in the gas migration pathways allows continuing potential of future significant impact without mitigation.</p>	<p>4.6-16 - External Training. After the experiences and upgrading of programs from the initial monitoring phase, training of the future owner(s) and City of Montebello staff shall be undertaken.</p> <p>SCG shall develop a standardized training program for gas monitoring, gas venting, documentation, and well abandonment suitable for the subsequent owner(s) and City staff, and others related to the west and main Montebello Oil Fields. Materials developed during monitoring and current</p>	<p>As a part of the SGMP SCG shall develop a training program for monitoring gas control systems in accordance with current EPA and DOGGR standards. Submit program to DOGGR, CPUC and City of Montebello for approval.</p>	<p>SCG in consultation and cooperation with DOGGR, the City of Montebello, and the CPUC.</p>	<p>During the decommissioning process, and obtain approval of program at least 60 days prior to transfer of MGSF properties.</p>

IMPACT	MITIGATION MEASURE	IMPLEMENTATION/ MONITORING METHOD	RESPONSIBLE PARTY	IMPLEMENTATION SCHEDULE
<p>Proper training to prevent future gas migration would reduce the impact of gas migration.</p>	<p>abandonment operations shall be used to demonstrate and train staff.</p>			
<p>The most important Project-related effect involves the continuing potential for gas migration from either the Storage Zone or Shallow Zones to the surface, as has been reported in the Project area in the past. Past experiences and lack of certainty in the gas migration pathways allows continuing potential of future significant impact without mitigation. Proper training to prevent future gas migration would reduce the impact of gas migration.</p>	<p>4.6-17 - Later Gas Controls Training. SCG shall review all documentation and monitoring of the then-current gas control systems and shall develop a training program for continuing and future operations during the remainder of the Project period.</p>	<p>As a part of the SGMP SCG shall develop a training program for monitoring gas control systems according to current EPA and DOGGR standards. Submit program to DOGGR, CPUC and City of Montebello.</p>	<p>SCG in consultation and cooperation with DOGGR, the City of Montebello, and the CPUC.</p>	<p>During the decommissioning process, and obtain approval of program at least 60 days prior to transfer of MGSF properties.</p>
<p>Potential impacts are associated with exposure of populations and structures to accumulation of soil gas in residential areas. If soil gas accumulates inside or under buildings or infrastructure systems, the threat of health hazards, fire, or explosion exists. Various methods exist for detection and removal of soil gas, thus minimizing the potential for accumulation inside structures. Without mitigation, this gas</p>	<p>4.6-18 - Later Gas Remediation. Adequate documentation of existing or new gas control venting systems will provide an excellent training base, which shall be required for the future owner(s).</p> <p>Gas remediation is currently required and during the initial phase of the Project additional areas of gas release could be added.</p> <p>If required, SCG shall develop trained staff, training programs, and improved venting systems for gas releases in the Montebello area. SCG shall develop and implement measures are required to remove escaping near-surface or well</p>	<p>As a part of the SGMP SCG shall develop documentation, training, and monitoring in accordance with current standards set by the EPA and the SCAQMD. Submit program to DOGGR, CPUC SCAQMD and City of Montebello.</p>	<p>SCG in consultation and cooperation with DOGGR, City of Montebello, the CPUC, and SCAQMD.</p>	<p>During the decommissioning process, and obtain approval of all reports, plans and programs at least 60 days prior to transfer of MGSF properties.</p>

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<p>accumulation would result in a significant adverse impact. Since the CPUC and SCG actions would take place before realization of risks in the future, measures shall be taken during the Decommissioning period, before transfer to subsequent owners.</p>	<p>gases from the MGSF lands for sale. SCG shall use the Michael Collins Circle venting system and any other available systems at that time for demonstration and training for removal of gas (e.g., wells versus trenches). All systems shall be approved by the City of Montebello in order that building permits and approvals can be issued before construction and with transfer(s) of ownership.</p> <p>If required, SCG shall review and develop adequate passive and positive extraction-collection-venting systems. For large areas, such as neighborhoods like Michael Collins Circle, extraction systems may require collection manifolds, extensive piping, and other equipment, including blowers or compressors.</p> <p>SCG installed and operated a ground gas venting system in the Michael Collins Circle east of Montebello Blvd. and shall continue to operate and monitor the system and gas composition and flows from the system. Before transfer of the East Site and wells east of Montebello Blvd., SCG shall fully document the existing system and update its performance to demonstrate its need and efficiency for the new owner(s) and City of Montebello.</p> <p>SCG shall annually or more frequently, if repairs, damages, or deterioration have occurred, re-inspect and document all existing ground gas venting wells to assure proper operating capability and usefulness during the first half of the</p>	<p>SCG shall prepare a report documenting past and present operations of gas venting and collection systems. If necessary develop new plans and designs for collection and extraction systems.</p>		

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	<p>decommissioning period.</p> <p>Potential air quality issues may be associated with venting soil gas may require SCAQMD permits, depending on concentrations of heavy hydrocarbon gases. SCG shall document previous City and SCAQMD permits and applications for venting equipment and shall prepare and submit appropriate permits for new venting systems, if required (e.g., &gt;500 ppm of non-methane hydrocarbons).</p>			
<p>The responsibility for mitigation and monitoring should be clearly defined to avoid problems on this issue.</p>	<p>Transfer Measures (4.6-19,4.6-20)</p> <p>Transfer mitigation measures are required to legally document the responsibilities of and assist the parties during and following the transfer. Such documentation shall also provide the cities of Montebello and Monterey Park with periodic (quarterly or more frequent as requested by the cities) updates and changes in responsibilities and obligations of SCG and the subsequent owner(s).</p> <p>4.6-19 – Responsibilities. In particular, documents shall define who retains responsibility for continued mitigation measures and, in particular, maintaining and operating the field-testing, monitoring, and remediation sites and equipment, wells, and probes.</p> <p>The City of Montebello and City of Monterey Park shall not bear responsibilities, unless they are owners of any former SCG property.</p>	<p>SCG shall prepare transfer documents with approval and comment from the City of Montebello, the City of Monterey Park, CPUC and DOGGR.</p>	<p>SCG in consultation and cooperation with DOGGR, the CPUC, the City of Montebello, the City of Monterey Park, and the new owners.</p>	<p>After the decommissioning process, and obtain approvals at least 60 days prior to transfer of MGSF properties.</p>

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<p>The transfer conditions should be clearly defined to avoid futures problems in this area.</p>	<p>4.6-20 - Transfer Conditions. SCG shall assure that any prospective new owner(s) shall have adequate financial and technical resources to maintain responsibilities for the geological zones, field, wells, and gas monitoring and venting systems.</p> <p>Transfer documents shall specify conditions and criteria for suspension, cancellation, or abandonment of gas monitoring and venting systems and concurrence by the cities of Montebello or Monterey Park for such suspension, cancellation, or abandonment</p> <p>The transfer documents shall also prescribe necessary indemnification and insurance requirements (if any) for the buyers and sellers.</p> <p>On-Going/Post-Transfer Measures</p> <p>Based on terms and condition set for in the property transfer documents, the responsibilities of the parties shall be defined upon execution of sales contracts and conditions shall apply for a period of two (2) years from the date of transfer. The responsible parties (new owner(s), City of Montebello and City of Monterey Park, and DOGGR) shall maintain and operate field test stations, monitoring stations, and remediation site equipment. The transfer documents will also prescribe necessary indemnification and insurance requirements for the future buyers and owners. All future revisions and changes in conditions shall be approved by the cities of Montebello or Monterey Park.</p>	<p>SCG shall prepare transfer documents with approval and comment from the City of Montebello, the City of Monterey, CPUC and DOGGR.</p> <p>The SGMP shall delineate in a clear and distinct section the Post-Transfer monitoring and mitigation measures that will be carried out by the various parties involved in the sale.</p>	<p>SCG in consultation and cooperation with DOGGR, the CPUC, the City of Montebello, the City of Monterey Park, and the new owners.</p> <p>SCG in consultation and cooperation with DOGGR, the CPUC, the City of Montebello, the City of Monterey Park, and the new owners.</p>	<p>After the decommissioning process, and obtain approvals at least 60 days prior to transfer of MGSF properties.</p> <p>After the decommissioning process and at least 60 days prior to transfer of MGSF properties.</p>

IMPACT	MITIGATION MEASURE	IMPLEMENTATION/ MONITORING METHOD	RESPONSIBLE PARTY	IMPLEMENTATION SCHEDULE
HAZARDS AND HAZARDOUS MATERIALS				
<p>Wastes from salvaging and abandonment activities include PCBs, asbestos, and lead paint that may be in or on buildings, equipment, and piping. Presence of PCB's, asbestos, or lead paint can lead to a health hazard or safety issue.</p>	<p>4.7-1. Tests shall be conducted prior to the removal of equipment, piping insulation, or painted surfaces to determine if PCB's, asbestos, or lead paint are present. If PCB's, asbestos, or lead paint are detected, encapsulation and other appropriate removal methods should be employed to ensure the substances are not released into the environment. The waste generated by these activities must be disposed at an appropriate hazardous waste disposal site in accordance with applicable federal, state and local regulations.</p>	<p>Hazardous material testing shall be conducted according to current federal, state, and local regulatory standards. A report of the testing shall be submitted to CalEPA, CalOSHA, EPA, OSHA, and the CPUC.</p>	<p>SCG</p>	<p>Prior to the decommissioning process</p>
<p>Hazardous materials and wastes would be encountered during the removal of surface facilities and from investigation/ remediation of historic spills.</p>	<p>4.7-2. If contamination is discovered during decommissioning, then the action taken, permits required, and agencies involved will depend on the size and location of the soil contamination. Spills that have not migrated from the property and pose no imminent danger to humans or property may simply be excavated without a permit or other agency action. When there has been a release from the property, or when spills could pose danger to humans or property, they are reported to the Department of Toxic Substances Control ("DTSC"). Remedial action shall be taken with the consent of the DTSC. Contaminated soil would be transported to TPS in Adelanto for thermal de-sorption or to Kettleman Hills Landfill for disposal.</p>	<p>Excavate contaminated soil according to DTSC standards. Dispose of any contaminated hazardous material or wastes in a manner approved by DTSC.</p> <p>Report on excavation methods and disposal to DTSC and the CPUC.</p>	<p>SCG in cooperation with DTSC.</p>	<p>During and after the decommissioning process.</p>
<p>Groundwater plumes are reported to migrate near or into the project area and may contain contaminants from the</p>	<p>4.7-3. Groundwater monitoring shall be conducted in order to assure that decommissioning does not influence groundwater migration along the</p>	<p>Perform groundwater monitoring according to current EPA standards. Submit a report of the monitoring findings to the</p>	<p>SCG in cooperation with LARWQCB.</p>	<p>Prior to, during, and after the decommissioning process.</p>

IMPACT	MITIGATION MEASURE	IMPLEMENTATION/ MONITORING METHOD	RESPONSIBLE PARTY	IMPLEMENTATION SCHEDULE
Operating Industries Inc. (OII) Landfill.	northern portions of the project area, see below also. If a release of contaminants from decommissioning activities impacts groundwater, then it must be reported to, and cleaned up under direction of, the LARWQCB.	LARWQCB and the CPUC.		
Wells have been known to leak and may release contaminants to surrounding formations and alluvium.	<p>4.7-4. Groundwater and formation monitoring shall be conducted in order to assure that decommissioning does not influence releases or past releases.</p> <p>Implementation of the above measures would avoid reasonably foreseeable potentially significant impacts with respect to hazards from abandonment and salvaging activities. The above measures would also reduce the risk of release or migration of hazardous substances to less than significant levels.</p>	<p>Perform groundwater monitoring according to current EPA standards.</p> <p>Submit a monitoring report to the LARWQCB and the CPUC.</p>	SCG	Prior to, during, and after the decommissioning process.
The current emergency response plan followed by SCG is designed for present operation of the facility. The project may require the plan to be updated and revised.	4.7-5. SCG shall revise the emergency response section of the Hazardous waste and Materials Management Plan. The plan will include mitigation as a result of foreseeable contamination due to the proposed abandonment. This mitigation will direct and supervise the disposition of hazardous wastes and materials.	Revise the current emergency response plan, implement during all phases of the project, and submit revised plan to the CPUC and the Montebello Fire Department.	SCG	Prior to the decommissioning process
Some abandonment and decommissioning activities would take place on the Main Facility and the East Site, which contains some flammable vegetation. These activities would increase a fire hazard in areas with flammable brush, grass, or trees.	4.7-6. SCG shall also update its emergency response plan with comment and approval from the City of Montebello Fire Department to address any possible fires started during decommissioning of the facility. SCG shall maintain a clear vegetative barrier from the property line (and approved by the Montebello Fire Department) during decommissioning to prevent the spread	Revise and implement a current emergency response plan according to Montebello Fire Department standards. Submit the revised plan to the Montebello Fire Department and the CPUC.	SCG in cooperation with City of Montebello Fire Department.	Prior to the decommissioning process



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	of any fires. SCG shall also provide fire extinguishers on-site and on all vehicles operating within the two fire sensitive areas during decommissioning.			
<b>HYDROLOGY AND WATER RESOURCES</b>				
<p>The proposed Project may cause a minor degradation in water quality if runoff from the site, potentially causing increased nutrient, debris, and sediments, reaches the Rio Hondo and San Gabriel Rivers, and ultimately the ocean. This degradation is expected to be minor and less than significant.</p> <p>The development of 22 houses that may occur after decommissioning and sale would not be likely to increase runoff such that the capacity of storm water drainage systems would be exceeded. Runoff during decommissioning would be similar to the existing runoff, which is adequately contained with the existing systems. The runoff would not provide substantial additional sources of polluted runoff. This impact would be less than significant.</p>	<p>4.8-1 - Surface Water/Runoff. A storm water management plan for decommissioning shall be prepared by SCG and approved by the state or local agency having jurisdiction. A copy shall be provided to the CPUC. Storm water runoff (see below) shall be reviewed by SCG in order to establish collection areas and to accommodate existing available capacity with urban development in the project sites.</p>	<p>Prepare and implement a storm water management plan according to LARWQCB standards.</p> <p>Submit a copy of the plan to the LARWQCB and the CPUC.</p>	<p>SCG in cooperation with appropriate state or local agency (LARWQCB) and the CPUC.</p>	<p>Prior to decommissioning and development</p>
<p>Reduced deep zone pressures may simulate downward migration of fresh groundwater (along the same pathways as those releasing high pressure deep gas to the</p>	<p>4.8-2 - Fresh Groundwater. Groundwater monitoring shall be conducted in order to assure that decommissioning does not influence groundwater movements and levels in the project area.</p>	<p>Perform groundwater monitoring according to current EPA standards.</p> <p>Submit the monitoring results to the Department of Water</p>	<p>SCG</p>	<p>Prior to, during, and after the decommissioning process</p>

IMPACT	MITIGATION MEASURE	IMPLEMENTATION/ MONITORING METHOD	RESPONSIBLE PARTY	IMPLEMENTATION SCHEDULE
<p>Michael Collins Circle area) and changes in freshwater movements and water quality. This induced migration would be a potentially significant impact. Mitigation measures 4.8-1, 4.8-2, and 4.8-3 are defined to avoid significant impacts.</p>	<p>Reduced deep zone pressures may simulate downward migration of fresh groundwater (along the same pathways as those releasing high pressure deep gas to the Michael Collins Circle area) and changes in freshwater movements and water quality. If monitoring identifies significant changes in deeper groundwater conditions that influence or may influence fresh groundwater resources (e.g., sudden depression of freshwater levels over or in the vicinity of wells or the field), changes would be required in decommissioning, gas recovery, and well abandonment or re-abandonment.</p>	<p>Resources (DWR), the LARWQCB, and the CPUC.</p>		
<p>Reduced deep zone pressures may simulate downward migration of fresh groundwater (along the same pathways as those releasing high pressure deep gas to the Michael Collins Circle area) and changes in freshwater movements and water quality. This induced migration would be a potentially significant impact. Mitigation measures 4.8-1, 4.8-2, and 4.8-3 are defined to avoid significant impacts.</p>	<p>4.8-3 - Saline Groundwater. Deep groundwater movements may be influenced by changes during decommissioning and during formation compression near or in the project area. Deep groundwater monitoring shall be conducted in order to assure that decommissioning does not influence deep groundwater movements and levels in the project area.</p> <p>Major or sudden changes in deep zone field pressures or inflows of deep groundwater may indicate changes in regional groundwater formations, especially those used for secondary or enhanced recovery in the adjacent Montebello Oil Field for the Shallow Zones. If substantial changes are identified, SCG shall consult with DOGGR to determine if corrective actions are necessary. If monitoring identifies significant changes in deeper groundwater conditions that influence or</p>	<p>Perform groundwater monitoring according to current EPA standards.</p> <p>Submit the monitoring results to the DWR, the LARWQCB, and the CPUC.</p>	<p>SCG</p>	<p>During the decommissioning process</p>

IMPACT	MITIGATION MEASURE	IMPLEMENTATION/ MONITORING METHOD	RESPONSIBLE PARTY	IMPLEMENTATION SCHEDULE
	<p>may influence fresh groundwater resources (e.g., sudden depression of freshwater levels over or in the vicinity of wells or the field), changes would be required in decommissioning, gas recovery, and well abandonment or re-abandonment.</p>			
<b>MINERAL RESOURCES</b>				
<p>Oil, oilfield-brine (deep groundwater), and the storage capability represent potentially valuable mineral or mineral-related sources, which may be adversely affected (lost) during and after decommissioning.</p>	<p>4.10-1 - Subsurface Mineral-Related Resources. Changes in groundwater, oils, and gas shall be monitored and recorded by SCG so as to provide a database for future mineral-related activities in the area after decommissioning.</p> <p>a. Before and during decommissioning, storage movements shall be documented in order to provide information for potential future uses of the storage zone.</p> <p>Prior to final abandonment, SCG shall review and evaluate the potential for water flooding or other suitable gas or liquid injections of the storage zone and report on the technical and financial feasibility of such operations in conjunction with the degassing to the CPUC. This shall include the potential future recovery of the storage zone and impact on the proposed activities and degassing-decommissioning schedule and values.</p>	<p>a. Monitor changes in groundwater, oil, and gas. Provide report of monitoring and any storage movements. Review and evaluate the potential for water flooding or other suitable gas or liquid injections of the storage zone and report on the technical and financial feasibility of such operations in conjunction with the degassing to the CPUC.</p> <p>b. Document mineral activities in a final report to the CPUC.</p>	<p>a. SCG in cooperation with the CPUC.</p> <p>b. SCG in cooperation with the CPUC.</p>	<p>a. Prior to and during the decommissioning process.</p> <p>b. Prior to final abandonment.</p>
<b>NOISE</b>				
<p>The potential remains that through a concentration of decommissioning activities noise generation on the Main</p>	<p>4.11-1. SCG shall prepare the decommissioning program, including schedules and mitigation measures for managing all potentially disturbing</p>	<p>Implement a decommissioning program that includes noise management according to current city noise ordinances and</p>	<p>SCG</p>	<p>Prior to the decommissioning process</p>

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<p>Facility could become excessive, and represent a potentially significant impact.</p>	<p>decommissioning activities, e.g., hazard-related elements, traffic, and noise. Nighttime and weekend noise levels shall be maintained at limits as specified in the Conditional Use Permit and the Special Use Permit issued by the City of Montebello, and by current City Ordinances.</p>	<p>biological mitigation measures.  Submit a report of the program to the City of Monterey Park, the City of Montebello, and the CPUC.</p>		
<b>TRANSPORTATION</b>				
<p>During the course of well abandonment, equipment removal, building demolition, and site clean up at the Main Facility; there is the potential for a changed type of trip generation from passenger vehicles and light duty trucks to larger truck traffic associated with those types of activities. Depending on the pace of decommissioning it is possible that there could be a short-term temporary increase in overall MGSF trip generation.</p>	<p>4.15-1. SCG shall work with the City of Montebello to determine if the proposed decommissioning activities will result in increased traffic. SCG shall prepare a Project traffic management plan to moderate truck circulation within the area and to the nearest major arterial roads if required by the City.</p>	<p>Implement a traffic management plan according to city and Caltrans standards.  Submit the plan to the City of Montebello, Caltrans, and the CPUC. Verify plan is implemented.</p>	<p>SCG in cooperation with the City of Montebello and Caltrans if required.</p>	<p>Prior to the decommissioning process</p>

