

7.0 Mitigation Monitoring and Reporting Program

This section provides the Mitigation Monitoring and Reporting Program (MMRP) for the Aera East Cat Canyon Redevelopment Plan Project (Project). Santa Barbara County, as the CEQA Lead Agency, would have the responsibility of ensuring that implementation of required mitigation as identified in this Environmental Impact Report (EIR) occurs as intended if the proposed Project (or an alternative) is approved. As the Owner/Applicant and Project proponent, Aera would be responsible for implementing all applicable measures, including the adopted mitigation measures and conditions of project approval, as well as conditions imposed in any permits or regulations administered by other responsible agencies.

Aera's application contained Avoidance and Minimization Measures (AMMs) to minimize the Project's environmental impacts in a manner consistent with applicable rules and regulations (see Appendix C and also provided in each environmental issue area section). Aera, PG&E, and SoCalGas proposed to implement these AMMs during the design, construction, and operation of the proposed Project in order to avoid or minimize potential environmental impacts. County and CPUC approval would be based upon Aera and PG&E adhering to the proposed Project as described in this document, including the AMMs, as well as any adopted mitigation measures identified by this EIR.

The MMRP for the proposed Project (or alternative) establishes the approach to implementing the mitigation measures identified in this EIR. If the project is approved and the MMRP described below is adopted by the County, a detailed Environmental Quality Assurance Program (EQAP) would be developed, as described in Section 7.2 below. The EQAP would describe compliance monitoring roles and responsibilities, and would be the mechanism whereby the County would implement the MMRP.

MMRP tables are presented at the end of each resource's environmental analysis section of this EIR (Sections 4.2 through 4.10) and are repeated in Section 7.5. These tables, along with the full text of the mitigation measures themselves, are central elements of the MMRP. Monitoring of compliance with the specified mitigation measures would be implemented throughout construction and operations.

7.1 Authority for the Mitigation Monitoring and Reporting Program

As the Lead Agency under the California Environmental Quality Act (CEQA), the County of Santa Barbara is required to adopt a program for monitoring and reporting on the implementation of mitigation measures for this project, if it is approved, to ensure that the adopted mitigation measures are implemented as defined in this EIR. This Lead Agency responsibility originates in Public Resources Code Section 21081.6(a) (Findings) and the CEQA Guidelines Sections 15091(d) (Findings) and 15097 (Mitigation Monitoring or Reporting).

7.2 Organization of the EQAP

If the proposed Project (or an alternative) is approved, the County would compile the Final MMRP and include it in the agency decision documents, as adopted. Based on the monitoring program, the EQAP would be prepared prior to the issuance of Zoning Clearance and would serve as a self-contained guide for implementing the program throughout project construction and operations. The EQAP shall be prepared according to procedures established by County Planning and Development (P&D), paid for by the Owner/Applicant, and submitted for review and approval by P&D. The EQAP shall include the following:

1. All conditions and mitigation measures imposed on this project and the impacts they are mitigating separated by subject area.

2. A plan for coordination and implementation of all measures and any additional plans and programs required therein.
3. A description of all measures the Owner/Applicant will take to assure compliance, including field monitoring, data collection, management and coordination of all field personnel and feedback to field personnel and affected County agencies including P&D.
4. A contractor to carry out the EQAP shall be selected by P&D in consultation with the Owner/Applicant. The contractor(s) will be under contract and responsible to the County, with all costs to be funded by the Owner/Applicant. The EQAP contractor shall appoint at least one On-site Environmental Coordinator (OEC) responsible for overall monitoring, but shall employ as many qualified specialists as necessary, as determined by P&D, to oversee specific mitigation areas (e.g. archaeologists, biologists). In addition, the OEC has the authority and ability to ensure compliance with all project conditions and to stop work in an emergency.
5. Contractor feedback responsibilities shall include weekly, monthly and quarterly reports (as specified in EQAP) to be prepared throughout grading and construction. These shall include status of development, status of conditions, incidents of non-compliance and their results and any other pertinent or requested data.

The EQAP shall also provide for any appropriate procedures not specified in the conditions of approval to be carried out if they are necessary to avoid environmental impacts.

7.3 Mitigation Compliance Responsibility

The responsibility for implementing adopted mitigation measures rests with Owner/Operator, unless otherwise specified in the measure, for the life of the Project.

As Lead Agency under CEQA, Santa Barbara County is responsible for monitoring an approved project to ensure that required mitigation measures are implemented. The purpose of the MMRP is to document that the mitigation measures required by the County are implemented and that mitigated environmental impacts are reduced to the level identified in the EIR.

When a mitigation measure requires that a study or plan be developed during the design or pre-construction phase of the project, Aera must submit the final study or plan to the County for review and approval. Any study or plan that requires approval of the County must allow time for adequate review. Other agencies and jurisdictions with authority over aspects of the project or particular resources may require additional review time. It would be the responsibility of the County environmental monitoring team to confirm that appropriate opportunities for agency reviews have occurred and required approvals obtained. The following presents a representative list of the various County entities and responsible agencies that may be involved in the review and approval of required studies and plans, as well as their implementation during construction and operations.

Santa Barbara County

- **Planning & Development Department, Energy & Minerals Division (P&D).** P&D is responsible for the permit application review for the proposed Project, including preparation of this EIR. If Project approval occurs, P&D will also be responsible for the development of the EQAP and its implementation, including the review and approval of preconstruction plans and studies, and coordination with applicable responsible agencies. During construction and operations, P&D will ensure that mitigation measures, plan

requirements, and permit conditions are being implemented through onsite monitoring and review of required compliance documentation.

- **Santa Barbara County Air Pollution Control District (APCD).** The APCD will review the various new stationary sources associated with the Project that are subject to APCD permitting requirements through the New Source Review program, in accordance with the applicable air quality management plans for air quality attainment adopted by the APCD Board.
- **County Public Works, Transportation Division.** The County's Public Works Department, Transportation Division, is responsible for the review and approval of Traffic Control Plans required for construction. Public Works will also be responsible for review and approval of any required Encroachment Permits, as well as Roadway Maintenance Agreement, to accommodate operations.
- **County Petroleum Office.** The Petroleum Office is responsible for implementation of the Petroleum Code, Chapter 25, and all other applicable laws, regulations and requirements regarding petroleum operations. The purpose of Chapter 25 is to protect the health, safety, public welfare, physical environment and natural resources of the County by the reasonable regulation of onshore petroleum facilities and operations. Chapter 25 supplements petroleum operations also regulated by the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR), as well as building, electrical, fire, and American Petroleum Institute codes. Petroleum Office representatives conduct onsite inspections to ensure code compliance, including well drilling (pre-, during, and post, then annual thereafter) and track any spills of reportable quantity. The Petroleum Office maintains permits for each well and coordinates with DOGGR and Regional Water Quality Control Board (RWQCB).
- **County Environmental Health Services.** Santa Barbara County Environmental Health Services is certified by the California Environmental Protection Agency as the Certified Unified Program Agency (CUPA) for the County of Santa Barbara. The CUPA regulates businesses that handle hazardous materials, generate or treat hazardous waste or operate aboveground or underground storage tanks, including the review and inspection of Hazardous Material Business Plan implementation. The primary goal of the CUPA Program is to protect public health and the environment by promoting compliance with applicable laws and regulations. All inspectors in the CUPA Program are trained Hazardous Materials Specialists who take part in continuous education program to ensure consistency and uniformity during inspections.

State Agencies

- **Department of Conservation's Division of Oil, Gas, and Geothermal Resources (DOGGR).** DOGGR regulates production of oil and gas, as well as geothermal resources, within the State of California. DOGGR regulates well design and construction standards, well operations, surface production equipment, and pipeline requirements. In addition, DOGGR regulates well abandonment procedures to ensure effectiveness in preventing migration of oil and gas from a producing zone to shallower zones, including potable groundwater zones. DOGGR also has regulatory authority over Class II injection wells for enhanced recovery and disposal.
- **California Department of Fish and Wildlife (CDFW).** CDFW is tasked with permitting any Project activities that will affect State listed sensitive and endangered species, as well as jurisdictional stream crossings. In addition, CDFW will review Project plans designed to mitigate for potential construction and operation impacts to State listed species, as well habitat restoration.
- **Regional Water Quality Control Board (RWQCB).** The RWQCB will review and monitor implementation of the Storm Water Pollution Prevention Plan (SWPPP), including Best Management Practices, for an approved Project. In the event of unauthorized contamination of surface waters, RWQCB mitigation

requirements would be implemented, in addition to any containment and clean-up requirements that may apply, including coordination with the County Petroleum Office and DOGGR for a petroleum release.

Federal Agencies

- **U.S. Fish and Wildlife Service (USFWS).** USFWS is tasked with permitting any Project activities that will affect federally listed sensitive and endangered species. In addition, USFWS will review Project plans designed to mitigate for potential construction and operation impacts to federally listed species, as well habitat restoration.

The County may delegate duties and responsibilities for monitoring to the EQAP contractor or consultants working on behalf of the agencies. Where areas or resources under other agency jurisdiction are potentially affected or involved some monitoring responsibilities may be assumed by the responsible agencies.

As the Owner/Operator, Aera would deploy its own monitors and consultants for its own purposes, to ensure implementation of its commitments and execution of its responsibilities. The number of Aera construction monitors assigned to the project would be determined by the company and would depend on the number of concurrent construction activities underway, their locations, and the types of resources potentially affected. The County would ensure that persons assigned monitoring duties by Aera are qualified to undertake those duties.

7.4 General Monitoring Procedures

7.4.1 Environmental Monitors & Agency Inspectors

The various mitigation measures, permit conditions of approval, and plan requirements will require implementation (1) prior to the start of construction (such as project final design review and plan development), (2) during construction and operations, and (3) post-construction (such as restoration). The County and its EQAP contractor are responsible for integrating the mitigation monitoring procedures into the construction and operation processes in coordination with Aera for County issued permits. To oversee the monitoring procedures and to ensure success, the assigned EQAP OEC(s) must be onsite during construction activity having the potential to create a significant environmental impact or other impact for which mitigation is required. Likewise, the EQAP OEC(s) and agency Inspectors (such as SSRRC, DOGGR and/or the County Petroleum Office) will be onsite to ensure compliance with their respective authorities during construction and operations.

7.4.2 Operations and Construction Personnel

A key element in the success of mitigation and mitigation monitoring is the full cooperation of project personnel and supervisors, during both construction and operations. Successful implementation of many of the mitigation measures requires specific actions and behaviors on the part of the construction supervisors or crews who will be hired and under contract to Aera. Likewise, mitigation developed for operations will need to be implemented by Aera and their staff and subcontractors (such as tanker truck firms). To ensure success, the following actions would be taken:

- Specific procedures to be followed by construction and operations contractor companies engaged to do their respective work would be written into their contracts with Aera. Procedures to be followed by construction and operations personnel would be written into an agreement that all construction and

operation personnel would be asked to sign, denoting consent to the procedures regardless if Aera staff or contractor,.

- As specified by mitigation, a Worker Environmental Awareness Program would be conducted to inform and train construction and operations personnel about the requirements of the monitoring program (as detailed in the EQAP). The OEC(s) would verify that each crew member received the required training.
- A written summary of mitigation monitoring procedures would be provided to construction and operations supervisors for all mitigation measures requiring their respective attention.

7.4.3 General Reporting Procedures

A checklist will be developed and maintained by the County EQAP contractor to track all mitigation measure requirements, including timing. The EQAP OEC(s) will note any problems that may occur and take appropriate action to rectify the problems. Consolidated weekly (or other specified frequency) reports will be prepared by the County EQAP OEC(s) documenting construction activities, compliance activities observed across issue areas, notification of compliance issues by Aera, any issues and their resolution, and photographs of relevant activities and conditions.

Aera is required to have its own monitors for particular resources, depending on project needs and activities. These monitors will prepare daily reports/surveys that will be provided to the County EQAP OEC(s). Construction is not allowed to start in a particular area until the required pre-construction surveys and flagging/staking are completed, all identified mitigation measures are in place and the County EQAP OEC(s) has validated compliance.

Aera is to provide the County with written weekly and annual reports of the Project, which shall include progress of construction, resulting impacts, mitigation implemented, and all other noteworthy elements of the Project.

The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports will be made available for public inspection by the County or its designee on request.

7.5 Mitigation Monitoring Tables

The following tables present the monitoring and reporting plan requirements for the mitigation measures identified in the environmental analysis sections of this EIR (see Sections 4.2 through 4.10), by issue area.

Table 7-1a. Mitigation Monitoring and Reporting Plan – Air Quality

MM #	MM Title	Monitoring/ Reporting Action	Timing & Method of Verification	Agency or County Responsibilities	Applicant Responsibilities
AQ-1a	Onsite Dust Control	Include dust control requirements on construction plans	Applicant submits plans including dust control requirements	County reviews plans, and inspects Project activities for proper implementation	Implement dust controls and prevent transport of dust offsite during all Project phases.
AQ-1b	Performance Specifications for Construction Fleet Engines	Include engine exhaust performance specifications with contracts	Applicant submits contracts including engine exhaust performance specifications	County inspects construction activity and reviews engine exhaust performance specifications in contracts	Implement construction activity limit and engine exhaust performance specifications.
AQ-2a	Performance Specifications for O&M Fleet Engines	Include engine exhaust performance specifications with contracts	Applicant submits contracts including engine exhaust performance specifications	County inspects O&M activity and reviews engine exhaust performance specifications in contracts	Implement O&M activity limit and engine exhaust performance specifications.
AQ-2b	Performance Specifications for CNG Tankers	Include CNG tanker truck engine exhaust performance specifications with contracts	Applicant submits contracts including engine exhaust performance specifications	County inspects tanker truck activity and reviews engine exhaust performance specifications in contracts	Implement tanker truck activity limit and engine exhaust performance specifications.
AQ-2c	Emission Reduction Credits for Emissions Increases	Obtain evidence of surrendered emission reduction credits	Applicant submits evidence of surrendering emission reduction credits	County reviews Applicant evidence and APCD response to surrendering emission reduction credits	Obtain and surrender emission reduction credits.

Table 7-1b. Mitigation Monitoring and Reporting Plan – Biological Resources

MM #	MM Title	Monitoring/ Reporting Action	Timing & Method of Verification	Agency or County Responsibilities	Applicant Responsibilities
BIO-1	Emergency Response Action Plan	Submittal and implementation of Action Plan Report implementation of emergency measures to P&D in the event of a spill	Prior to County issuance of Zoning Clearance and during construction and operations	County to review Action Plan County to verify Action Plan implementation	Prepare an Emergency Response Action Plan that addresses protection of sensitive biological and hydrological resources, restoration of any areas disturbed during a spill and associated clean- up activities, and other required components.
BIO-2: General Biological Resources Protection Measures					
BIO-2(a)	Delineate Work Areas	All work areas are clearly delineated in the field. General biological resource protection measures are met.	During construction	County to verify compliance	Clearly delineate work areas in the field. All work areas will be approved by the Project engineer in consultation with an approved biologist. Staking to be completed under the supervision of a qualified biologist.

Table 7-1b. Mitigation Monitoring and Reporting Plan – Biological Resources

MM #	MM Title	Monitoring/ Reporting Action	Timing & Method of Verification	Agency or County Responsibilities	Applicant Responsibilities
BIO-2(b) and BIO- 2(c)	Site Pipeline Routes to Avoid Sensitive Habitats	Pipeline routes micrositied to avoid sensitive vegetation and oak trees and clearly delineated in the field. Natural gas pipeline construction only within compacted roadbeds in existing roadways.	During construction	County to verify compliance	Clearly delineate work areas in the field. All work areas will be approved by the Project engineer in consultation with an approved biologist. Staking to be completed under the supervision of a qualified biologist. All new pipeline construction shall be monitored by a qualified biologist.
BIO-2(d)	No New Disturbance for Support Areas	Lay down areas, parking, staging, stockpiling, and other support areas only on previously disturbed areas with compacted soils. Provide concurrence from USFWS for any staging areas in designated critical habitat.	During construction, prior to ground disturbance (USFWS concurrence)	County to verify compliance	Clearly delineate support areas in the field. Only establish support areas on previously disturbed and compacted soils. Provide USFWS concurrence as applicable.
BIO-2(e)	Trash	Trash is eliminated on site.	During construction	County to verify compliance	Store all trash in animal proof containers or remove from site each day. No deliberate feeding of wildlife.
BIO-2(f)	Waste recycling	Remove concrete and asphalt waste from site for recycling or proper disposal.	During construction	County to verify compliance	Do not place materials outside of work zone. Place stockpiled material within work zone in areas previously disturbed and free of small mammal burrows.
BIO-2(g)	Equipment washing	Polluted water and materials are contained and removed from the site, and sensitive resources are avoided.	During construction	County to verify compliance	Conduct washing of concrete trucks, paint, equipment, or similar activities in areas where polluted water and materials can be contained for subsequent removal from the site. Designate wash areas at least 100 feet from any storm drain, waterbody, or sensitive biological resource.

Table 7-1b. Mitigation Monitoring and Reporting Plan – Biological Resources

MM #	MM Title	Monitoring/ Reporting Action	Timing & Method of Verification	Agency or County Responsibilities	Applicant Responsibilities
BIO-2(h)	Weeds	Avoid the introduction of weeds.	During construction	County to verify compliance	Ensure that tracked vehicles and other construction equipment are weed-free prior to entering and working within undeveloped areas.
BIO-2(i)	SWPPP	Submittal and compliance with SWPPP.	Prior to and during construction	County to verify compliance	Prepare and include best available erosion and sediment control measures into the SWPPP.
BIO-2(j)	Hazardous Materials	Use of chemicals, fuels, lubricants, or biocides will be in compliance with all local, State, and federal regulations.	During construction	County to verify compliance	Uses of such compounds shall observe label and other restrictions mandated by State and federal regulations.
BIO-2(k)	Lighting	Lighting is minimized and downcasted.	During construction	County to verify compliance	Minimize new light sources and downcast lighting to limit the lighted areas.
BIO-2(l)	Wildlife Protection	Mortality on roads is minimized.	During construction and operations	County to verify compliance County to review requests for planned nighttime work	Routine construction and O&M activities shall be conducted during daylight hours only.
BIO-2(m)	Implement APLIC guidelines	Bird collision and electrocution is minimized	During operation	County to verify compliance	Design 115-kV power line to APLIC standards to minimize collision and electrocution risk.
BIO-2(n)	Prevent wildlife entrapment	Minimize potential for wildlife to fall into open excavations, including trenches along natural gas pipeline, during construction.	During construction	County to verify compliance	Securely cover all excavations at the end of each work day or provide escape ramps.

Table 7-1b. Mitigation Monitoring and Reporting Plan – Biological Resources

MM #	MM Title	Monitoring/ Reporting Action	Timing & Method of Verification	Agency or County Responsibilities	Applicant Responsibilities
BIO-3	Implement Best Management Practices to Minimize Impacts to Riparian and Wetland Areas during Construction and Operation	Provide County with copies of the CDFW Streambed Alteration Agreement and Clean Water Act Section 301 and 404 permits (if required for the project), or a written determination from the applicable regulatory agencies that such permit(s) are not necessary.	Prior to County issuance of Zoning Clearance	County to verify permit submittal and compliance during implementation	Provide CDFW and USACE permits to County. Implement all mitigation measures and conditions contained within the Streambed Alteration Agreement, requirements of the Regional Water Quality Control Board or the U.S. Army Corps of Engineers for impacts to Waters of the State or U.S. Implement all identified BMPs during construction and operation activities in or near ephemeral drainages, Cat Canyon Creek, Long Canyon Creek, or aquatic features (including man-made ponds).
BIO-4	Environmental Training Program	Provide the County with evidence that all personnel have completed the training (monthly during construction and annually during operation and maintenance).	Prior to the start of construction and prior to new personnel beginning work on the proposed Project; throughout construction and operations phases. Training outline submitted to County prior to issuance of Zoning Clearance. During operations, the training program shall be reviewed and updated annually.	County reviews and approves the training and annual updates. County approves biologist who develops and conducts environmental training.	Develop and conduct environmental training program for all proposed Project personnel. Provide the County with evidence that all personnel have completed the training. Document compliance in a written report on a monthly basis during construction and an annual basis during operations. Update training program annually during operations.
BIO-5	Weed Control Plan (WCP)	Preparation and implementation of WCP. Submit pre-disturbance survey report and annual WCP summary reports.	Prior to County issuance of Zoning Clearance	County to review and approve WCP County to approve restoration ecologist County to verify compliance County to review pre-disturbance survey reports and annual WCP reports.	Retain a County-approved, qualified restoration ecologist or biologist to prepare a comprehensive adaptive WCP which includes all required elements. Implement WCP throughout construction and operations. Document compliance in annual summary reports throughout the life of the proposed Project.
BIO-6a	Conservation Easement	Recordation of conservation easement, identification of easement holder	Prior to approval of initial Notice to Proceed	County to provide easement language; County to approve easement holder	Identify proposed easement holder; record conservation easement

Table 7-1b. Mitigation Monitoring and Reporting Plan – Biological Resources

MM #	MM Title	Monitoring/ Reporting Action	Timing & Method of Verification	Agency or County Responsibilities	Applicant Responsibilities
BIO-6b	Conservation Habitat Management and Monitoring Plan	Prepare a Habitat Management and Monitoring Plan for the conservation area	Prior to issuance of the Zoning Clearance	County to conduct periodic site inspections to validate restoration efforts and shall review any required reporting	Implement Habitat Management and Monitoring Plan and submit required reporting
BIO-7	Habitat Restoration Plan	Submittal and implementation of Habitat Restoration Plan.	Prior to County issuance of Zoning Clearance. Maintain the restoration areas until they have met the established success criteria, or for a period of not less than five years following planting, whichever is longer.	County to review and approve Habitat Restoration Plan County to verify Plan implementation Release performance securities upon successful installation and maintenance	Prepare and implement a Habitat Restoration Plan to ensure that habitats temporarily disturbed during construction are restored to the pre-Project character and functional value and that permanent impacts are compensated at a 3:1 ratio. Post a performance security to ensure installation and a maintenance security for five years of maintenance. Document compliance in a written report on an annual basis
BIO-8	Environmental Quality Assurance Program Monitor	Biological monitoring and reporting	Prior to vegetation removal or ground-disturbing activities, and during construction and restoration	County to contract with EQAP monitor to verify mitigation compliance EQAP monitor and P&D permit compliance staff perform site inspections throughout the construction phase and review required Applicant reports	Fund EQAP monitor position through restoration phase.
BIO-9	Biological Construction Monitoring	Biological monitoring and reporting	Prior to vegetation removal or ground-disturbing activities, and during construction (minimum weekly)	County to approve biologist(s) and verify compliance County, CDFW & USFWS (as applicable) review report of injured or dead special-status wildlife	Retain a County-approved, qualified biologist(s) to monitor all vegetation removal and initial ground disturbance in all vegetated habitats (except for agriculture and disturbed habitats.) Submit report documenting any dead or injured listed or special-status wildlife within 5 calendar days.

Table 7-1b. Mitigation Monitoring and Reporting Plan – Biological Resources

MM #	MM Title	Monitoring/ Reporting Action	Timing & Method of Verification	Agency or County Responsibilities	Applicant Responsibilities
BIO-10	Special-Status Plant Surveys and Impact Mitigation	Special-status plant survey, avoidance., and salvage. Monthly (for pre-construction surveys), and annually (for Special-Status Plant Salvage and Transplant Plan) compliance reports	Prior to and during construction	County to review survey reports and special-status plant inventories County to approve plant ecologist or botanist County to review and approve Special-Status Plant Salvage and Relocation Plan	Conduct surveys for special-status plants in all areas subject to ground-disturbance or vegetation removal and a 50-ft buffer. Submit and implement Special-Status Plant Salvage and Relocation Plan 30 days prior to salvage. If impacts to listed plants cannot be avoided, the USFWS and/or CDFW shall be consulted. Document compliance in monthly (for pre-construction surveys), and annual (for Special-Status Plant Salvage and Transplant Plan) reports to the County.
BIO-11	Pre-Construction Surveys and Avoidance Measures for Special-Status Reptiles and Amphibians including California Tiger Salamander (CTS) and California Red-Legged Frog (CRLF)	Pre-construction surveys and avoidance measures. Monthly monitoring reports.	Prior to County issuance of Zoning Clearance and after rain events of 0.5" over 24 hours	County to review surveys and verify compliance. County reviews monthly compliance reports. County EQAP monitor to conduct periodic site inspections. County to approve biologist, including USFWS & CDFW permit authority	Conduct pre-construction surveys for CTS and CRLF, and implement avoidance measures. Additional measures to be implemented if construction occurs during the wet season Exclusion fencing at all active work areas within 1.4 miles of Ponds SISQ-9w and SISQ-9e. Cease work and notify USFWS, CDFW and County if CTS or CRLF are found onsite. Document compliance in monthly monitoring reports
BIO-12	Pre-Construction Surveys and Avoidance Measures for Monarch Butterflies	Submittal of focused surveys, and monthly and final reports.	Prior to County issuance of Zoning Clearance and during construction	County approves biologist County to verify monarch roosts are avoided during use County reviews monthly and final reports	Conduct pre-construction surveys during monarch roosting season, and monitor active roosts during construction. Flag active roosts and establish a disturbance-free buffer. Prepare a site-specific roost avoidance strategy if additional protection measures are determined necessary by the monitoring biologist. Prepare and submit monthly and final monitoring reports..

Table 7-1b. Mitigation Monitoring and Reporting Plan – Biological Resources

MM #	MM Title	Monitoring/ Reporting Action	Timing & Method of Verification	Agency or County Responsibilities	Applicant Responsibilities
BIO-13	Pre-Construction Surveys and Impact Avoidance Measures for Migratory and Nesting Birds	Submittal of surveys, plans, and reports	Prior to County issuance of Zoning Clearance and during construction	County to approve biologist(s) County to review survey reports County to review site-specific nest protection plans County to review monthly and final reports	Conduct pre-construction surveys during bird breeding season, and monitor active nests during construction. Flag active nests and establish a disturbance-free buffer. Prepare a site-specific nest avoidance strategy if additional protection measures are determined necessary by the monitoring biologist. Prepare and submit monthly and final monitoring reports.
BIO-14	Maternity Colony or Hibernaculum Surveys and Avoidance Measures for Sensitive Bats	Submittal of surveys and implementation of avoidance measures.	Prior to and during construction	County reviews surveys County to approve biologist	Conduct maternity colony or hibernaculum surveys no more than 15 days prior to vegetation removal or initial site disturbance in previously undisturbed areas. Notify County and follow protocols for the removal of potential roosting habitat and safe eviction of non-breeding bats. Monitor and report the results of such evictions to County. Cease work within 100 ft of hibernation and maternity roosts.
BIO-15	Focused Surveys and Avoidance Measures for American Badger and San Diego Woodrat	Submittal of surveys and report and implementation of avoidance measures.	Prior to and during construction	County reviews surveys County to approve biologist CDFW to review buffer modifications and relocations County & CDFW to review final report.	Conduct focused surveys for American badger and San Diego woodrat and implement avoidance measures no more than 30 days prior to vegetation clearing or grading and implement avoidance measures. Coordinate with CDFW on buffer modifications and relocations. Prepare a final report documenting all badger and woodrat activities.

Table 7-1b. Mitigation Monitoring and Reporting Plan – Biological Resources

MM #	MM Title	Monitoring/ Reporting Action	Timing & Method of Verification	Agency or County Responsibilities	Applicant Responsibilities
BIO-16(a)	Oak Tree Protection Plan (OTPP)	Submittal and compliance with the OTPP.	Prior to County issuance of Zoning Clearance	County reviews OTPP Plan County approves biologist to prepare OTPP County documents that trees identified for protection were not damaged or removed or, if damage or removal occurred, that correction is completed as required by the OTPP.	Prepare, submit, and (upon final revisions and approval) implement an Oak Tree Protection Plan (OTPP).
BIO-16(b)	Oak Tree Replacement Plan (OTRP) – Planned Removal and Unexpected Damage	Submittal and compliance with the OTRP.	Prior to County issuance of Zoning Clearance Minimum 7-year maintenance period for replacement trees	County reviews OTRP County conducts periodic site inspections to monitor installation and maintenance of replacement trees. Release performance security upon successful Plan implementation.	Prepare, submit, and implement (upon final review and approval) an OTRP. Post a performance security to ensure installation and a minimum 7-year maintenance period for replacement trees prior to initial brushing or grading.
BIO-16(c)	Onsite Arborist/Biologist	Designate an arborist/biologist to be onsite throughout all grading and construction activities which may impact native trees to ensure all aspects of the approved Oak Tree Protection & Oak Tree Replacement Plans are implemented.	Prior to the initial onsite pre-construction meeting	County approves arborist/biologist to prepare Oak Tree Protection and Oak Tree Replacement Plans. County coordinates with the arborist/biologist and conducts site inspections.	Submit name and contact information for the arborist/biologist to P&D
BIO-16(d)	Invasive Plant Pathogen Abatement (SOD Prevention).	Designate a P&D-approved biologist to minimize the unintended movement of host material, soil, and water from areas infested with <i>Phytophthora</i> spp.	Prior to County issuance of Zoning Clearance Continues throughout soil disturbing activities, including restoration, oak protection, and oak replacement activities.	County approves biologist to monitor activities and implement prevention if needed. County coordinates with the biologist and conducts site inspections.	Submit name and contact information for the biologist to P&D
BIO-17	HDD Fluid Management Plan for the Natural Gas Pipeline	Submittal of draft Plan and SAA, and implementation of Plan and permit requirements	During HDD operations along natural gas pipeline	County to review and approve Plan. P&D shall conduct periodic site inspection(s) during HDD activity and periodically thereafter until site restoration is completed	Prepare and submit draft Plan to County. Submit to County executed SAA. Notify P&D permit compliance staff in advance of the schedule for conducting HDD activities Implement Plan and SAA.

Table 7-1c. Mitigation Monitoring and Reporting Plan – Climate Change/Greenhouse Gas Emissions

MM #	MM Title	Monitoring/ Reporting Action	Timing & Method of Verification	Agency or County Responsibilities	Applicant Responsibilities
GHG-1	Reduce GHG Emissions or Surrender Offset Credits	Obtain evidence of GHG reductions achieved or surrendered GHG offset credits	Applicant submits evidence of GHG reductions or surrendering GHG offset credits	County reviews Applicant evidence of reducing GHG or surrendering GHG offset credits	Reduce GHG or obtain and surrender GHG offset credits

Table 7-1d. Mitigation Monitoring and Reporting Plan – Cultural, Tribal Cultural and Paleontological Resources

MM #	MM Title	Monitoring/ Reporting Action	Timing & Method of Verification	Agency or County Responsibilities	Applicant Responsibilities
CULT-1	Worker Environmental Awareness Program (WEAP)	Provide WEAP training to supervisors and field crews. Cultural Resources Specialist and Tribal Representative to prepare training.	Prior to commencement of pre-construction and construction activities. Provide WEAP sign-in sheet on day of training. Provide WEAP training sticker for hard hat upon completion of WEAP training.	County to approve WEAP. County to review WEAP sign-in sheets. County to conduct field check of crew and monitor hard hat stickers.	The Owner/Applicant shall ensure WEAP is written by a Secretary of the Interior qualified and County approved archaeologist. Owner/Applicant shall have all construction supervisors, worker crews, heavy equipment operators, and landscaping staff complete WEAP training prior to beginning ground disturbing construction activities.
CULT-2a	Cultural and Tribal Resource Monitors	Archaeological and Native American monitoring within moderate to high previously undisturbed sensitive Holocene sediments.	Provide contract/letter with Project archaeological monitor prior to issuance of Zoning Clearance. Monitoring during construction	County to approve archaeological monitor. County to approve Native American monitor. County to conduct field check of archaeological and Native American monitors	The Owner/Applicant shall have all ground disturbances occurring within moderate to high sensitive Holocene sediments throughout the Project oil development area, Conservation Easement, 115 kV power line route, and natural gas pipeline route monitored by a P&D approved archaeologist and a Native American consultant in compliance with the provisions of the County Archaeological Guidelines. Applicant shall retain a cultural resources specialist who meets or exceeds the Secretary of Interior's Professional Qualification Standards in archaeology. Applicant shall retain a Native American monitor if pre-historic cultural resources are identified by the qualified archaeological monitor. The archaeological monitor shall document interim results of the construction monitoring with logs and photographs.

Table 7-1d. Mitigation Monitoring and Reporting Plan – Cultural, Tribal Cultural and Paleontological Resources

MM #	MM Title	Monitoring/ Reporting Action	Timing & Method of Verification	Agency or County Responsibilities	Applicant Responsibilities
CULT-2b	Cultural Resources Management Plan (CRMP)	P&D approved archaeologist shall prepare a CRMP document prior to issuance of the Zoning Clearance.	To be completed prior to issuance of Zoning Clearance Implement during construction	County reviews and approves CRMP. Conduct field spot-checks during construction to ensure compliance with CRMP.	Copies of daily logs and a summary of activities shall be provided to the County if no resources are identified. A Cultural Resources Report shall be prepared and provided to the County and CHRIS if resources are identified. Applicant shall retain a cultural resources specialist who meets or exceeds the Secretary of Interior's Professional Qualification Standards in archaeology to prepare the CRMP. Applicant shall ensure protocols, guidelines, and procedures of the CRMP are adhered to during pre-construction and construction activities.
CULT-2c	Archaeological Sensitivity Area Monitoring Plan (ASAMP)	P&D approved archaeologist shall prepare an ASAMP document prior to issuance of the Zoning Clearance.	To be completed prior to issuance of Zoning Clearance Implement during construction	County reviews and approves ASAMP. Conduct field spot-checks during construction to ensure compliance with ASAMP.	Applicant shall retain a cultural resources specialist who meets or exceeds the Secretary of Interior's Professional Qualification Standards in archaeology to prepare the ASAMP. Applicant shall ensure protocols, guidelines, and procedures of the ASAMP are adhered to during pre-construction and construction activities.
CULT-3	Stop Work at Encounter	Redirect work in the event archaeological or human remains are encountered and evaluate significance of the find.	Confirm this requirement is printed on all building and grading plans prior to issuance of Zoning Clearance Implement during construction	County reviews building and grading plans. Monitor during construction.	The cultural resources specialist shall notify the County and Applicant of work stoppage. Applicant shall ensure that CULT-3 requirements are printed on all building and grading plans. Applicant shall retain a cultural resources specialist who meets or exceeds the Secretary of Interior's Professional Qualification Standards in archaeology to evaluate and treat the discovery. Implement during construction.

Table 7-1d. Mitigation Monitoring and Reporting Plan – Cultural, Tribal Cultural and Paleontological Resources

MM #	MM Title	Monitoring/ Reporting Action	Timing & Method of Verification	Agency or County Responsibilities	Applicant Responsibilities
CULT-4	Incidental Discovery of Historical Resources or Unique Archaeological Resources	Evaluation and treatment of previously unidentified historical or archaeological resources.	During construction	County ensures a qualified specialist is hired to evaluate and treat resource.	<p>If an incidental discovery of historical or archaeological resources is made, work shall halt immediately within 20-feet (6-meters) of the discovery.</p> <p>Applicant shall retain a cultural resources specialist who meets or exceeds the Secretary of Interior's Professional Qualification Standards to evaluate and treat the discovery.</p>
CULT-5	Incidental Discovery of Tribal Cultural Resources	Evaluation and treatment of discovered Tribal Cultural Resources	During construction	County ensures that a qualified specialist is hired to evaluate and treat resource.	<p>If an incidental discovery of tribal cultural resource is made, work shall halt immediately within 20 feet (6 meters) of the discovery.</p> <p>Applicant shall notify the County and local tribal representative by phone and in writing.</p> <p>Applicant shall retain a cultural resources specialist who meets or exceeds the Secretary of Interior's Professional Qualification Standards to evaluate and record the discovery.</p> <p>Applicant shall allow the discovery to be examined by a tribal representative qualified to identify tribal cultural resources as defined in AB 52.</p> <p>The applicant shall not share any information gathered during tribal AB 52 consultation without prior written tribal consent.</p>

Table 7-1d. Mitigation Monitoring and Reporting Plan – Cultural, Tribal Cultural and Paleontological Resources

MM #	MM Title	Monitoring/ Reporting Action	Timing & Method of Verification	Agency or County Responsibilities	Applicant Responsibilities
CULT-6	Incidental Discovery of Human Remains	If human remains are found, all ground disturbing activities shall halt within 165 feet (50 meters). Evaluation and treatment of discovered human remains in accordance with CA Health & Safety Code 7050.5 and PRC Section 5097.98.	During construction	The Santa Barbara County Coroner shall determine if the remains are Native American within 2-working days of notification of the discovery. The County Coroner must notify the NAHC within 24 hours after the remains have been determined to be Native American. The NAHC must immediately notify those persons it believes to be the MLD. The County shall consult with the MLD in regards to the disposition of human remains	If human remains are discovered, all work shall halt immediately within 165 feet (50 meters) of the discovery. Applicant shall contact the Santa Barbara County Coroner within 24 hours of the discovery. The applicant shall grant the MLD access to the site so they can complete their inspection of the remains.
CULT-7a	Paleontological Resource Monitor	Paleontological monitoring within high sensitivity geologic sediments, as defined by SVP (2010).	Provide contract/letter with Project paleontological monitor prior to issuance of Zoning Clearance Monitoring during construction	County to approve a paleontological monitor County to conduct field check of paleontological monitor	The Owner/Applicant shall have all ground disturbances occurring within high sensitive geologic sediments throughout the Project oil development area, Conservation Easement, 115 kV power line route, and natural gas pipeline route monitored by a P&D approved paleontologist to ensure compliance. Applicant shall retain a paleontological resources specialist who meets or exceeds the SVP's educational standards for paleontology. The paleontological monitor shall document interim results of the construction monitoring with logs and photographs. Copies of daily logs and a summary of activities shall be provided to the County if no resources are identified. A Paleontological Resources Report shall be prepared and provided to the County and appropriate local paleontology repository if resources are identified.

Table 7-1d. Mitigation Monitoring and Reporting Plan – Cultural, Tribal Cultural and Paleontological Resources

MM #	MM Title	Monitoring/ Reporting Action	Timing & Method of Verification	Agency or County Responsibilities	Applicant Responsibilities
CULT-7b	Paleontological Resources Management Plan (PRMP)	P&D approved paleontologist shall prepare a PRMP document prior to issuance of the Zoning Clearance.	To be completed prior to issuance of Zoning Clearance Implement during construction	County reviews and approves PRMP. Conduct field spot-checks during construction to ensure compliance with PRMP.	Applicant shall retain a paleontology resources specialist who meets or exceeds the SVP's Professional Qualification Standards in paleontology to prepare the PRMP. Applicant shall ensure protocols, guidelines, and procedures of the PRMP are adhered to during pre-construction and construction activities.
CULT-8	Stop Work at Encounter	Redirect work in the event paleontological resources are encountered and evaluate significance of the find.	Confirm this requirement is printed on all building and grading plans prior to issuance of Zoning Clearance Implement during construction	County reviews building and grading plans. Monitor during construction.	The paleontologist shall notify the County and Applicant of work stoppage. Applicant shall ensure that CULT-8 requirements are printed on all building and grading plans. Applicant shall retain a paleontology specialist who meets or exceeds the Secretary of Interior's Professional Qualification Standards in archaeology to evaluate and treat the discovery. Implement during construction.
CULT-9	Incidental Discovery Paleontological Resources	Redirect work in the event paleontological remains are encountered and evaluate significance of the find.	Confirm this requirement is printed on all building and grading plans prior to issuance of Zoning Clearance Implement during construction	County reviews building and grading plans. Monitor during construction.	The paleontological resources specialist shall notify the County and Applicant of work stoppage. Applicant shall ensure that CULT-7b requirements are printed on all building and grading plans. Applicant shall retain a paleontological resources specialist who meets or exceeds the SVP's educational standards in paleontology to evaluate and treat the discovery. Implement during construction.

Table 7-1d. Mitigation Monitoring and Reporting Plan – Cultural, Tribal Cultural and Paleontological Resources

MM #	MM Title	Monitoring/ Reporting Action	Timing & Method of Verification	Agency or County Responsibilities	Applicant Responsibilities
CULT-10	Resource Flag and Avoid	<p>Prior to pre-construction activities, stake flagging to ensure avoidance of resources PGE-1 and SCGP-1.</p> <p>Maintain flagging for the duration of construction activities occurring along the 115 kV power line and natural gas pipeline installation.</p>	<p>Prior to pre-construction and construction activities</p> <p>Renew flagging as needed</p>	<p>P&D shall conduct a field visit during pre-construction activities to confirm flagging has been staked using a 50-ft. buffer surrounding each resource.</p> <p>P&D shall conduct field spot-checks to confirm flagging surrounding each resource is intact and visible.</p>	<p>Applicant shall ensure that flagging is staked at the correct resource location and using a 50-ft. buffer surrounding each resource.</p> <p>Applicant shall ensure that discussion of flag and avoid measures are included in WEAP training and understood by supervisors and worker crews.</p>

Table 7-1e. Mitigation Monitoring and Reporting Plan – Geologic Processes/Geologic Hazards

MM #	MM Title	Monitoring/ Reporting Action	Timing & Method of Verification	Agency or County Responsibilities	Applicant Responsibilities
GEO-1	Soils Engineering Study	<p>Submit a soils engineering study addressing structure sites and access roads to determine structural design criteria.</p>	<p>Study review and approval prior to County Zoning Clearance.</p> <p>Monitor implementation during construction.</p>	<p>County reviews and approves the Soils Engineering Study, and implementation of required design requirements.</p>	<p>Prepare Soils Engineering Study to identify expansive and corrosive soils that would be in contact with Project features.</p> <p>Implement any required design requirements for expansive or corrosive soils in the final project design.</p>
GEO-2	Unknown Contaminated Soils	<p>Observe soils in Project disturbance areas excavated materials for soil contamination. Sample and test suspected contaminated soil. Submit Remediation Plan if contaminated soils are encountered.</p>	<p>P&D and local CUPA to be notified immediately of contaminated soils. Review of Remediation Plan and its implementation.</p>	<p>County shall review and approve Remediation Plan and monitor its implementation.</p>	<p>Conduct visual assessment of Project disturbance areas soils and excavated materials for unknown contamination.</p> <p>If contaminated soils are encountered, stop work and prepare Remediation Plan for County review and approve.</p> <p>Implement Remediation Plan requirements.</p>
GEO-3	Fault Evaluation Study and Design.	<p>Perform fault evaluation study for natural gas pipeline and submit study results and design modifications to withstand fault rupture, as necessary.</p>	<p>Submit study results and proposed design solutions to County for review and approval at least 60 days before final Project design</p>	<p>County shall review and approve Fault Study and design modifications, and monitor its implementation</p>	<p>Conduct fault evaluation study and provide fault rupture design solutions for the natural gas pipeline final design plan.</p> <p>Implement any required design requirements for fault rupture across the natural gas pipeline in the final Project design</p>

Table 7-1f. Mitigation Monitoring and Reporting Plan – Hazardous Materials/Risk of Upset

MM #	MM Title	Monitoring/ Reporting Action	Timing & Method of Verification	Agency or County Responsibilities	Applicant Responsibilities
Risk of Upset					
RISK-1	Emergency Response Plan (ERP)	Prepare and implement ERP	Prior to issuance of Zoning Clearance	P&D review and approval. P&D staff to monitor implementation	Prepare and submit Aera East Cat Canyon ERP Implement ERP requirements for the life of the Project.
RISK -2	Oil Spill Contingency Plan (OSCP)	Prepare and implement OSCP	Prior to issuance of Zoning Clearance	P&D review and approval. P&D staff to monitor implementation	Prepare and submit Aera East Cat Canyon OSCP Implement OSCP requirements for the life of the Project.
RISK-3	Spill Prevention Control & Countermeasure Plan (SPCC)	Prepare and implement SPCC	Prior to issuance of Zoning Clearance	P&D review and approval. P&D staff to monitor implementation	Prepare and submit Aera East Cat Canyon SPCC Implement SPCC requirements for the life of the Project.
RISK-4	Truck Hazard Mitigation Plan	Prepare and implement Truck Hazard Mitigation Plan	Prior to issuance of Zoning Clearance	P&D shall review and approve the plan. P&D shall review incident and annual reports.	Prepare a Truck Hazard Mitigation Plan for LCO and blended trucking. Implement Plan requirements for the life of the Project.
Hazardous Materials					
HAZ-1	Corrosion Control and Inspection Program	Prepare and implement Corrosion Control and Inspection Program	Prior to issuance of Zoning Clearance	P&D review and approval. P&D staff to monitor implementation	Prepare and submit Aera East Cat Canyon Corrosion Control and Inspection Program. Implement Program requirements for the life of the Project.
Fire Protection					
FIRE-1	Fire Protection Master Plan	Fire Protection Master Plan preparation and implementation	Prior to issuance of Zoning Clearance.	County Fire shall review and approve the plan. County Fire shall enforce the requirements of the Plan throughout the life of the Project.	Prepare a Fire Protection Plan to include existing and new facilities and any additional fire safety features (e.g., access roads, adequate onsite fire water supply, updated emergency procedures) as required by the Fire Department. Implement Plan requirements for the life of the Project.

Table 7-1g. Mitigation Monitoring and Reporting Plan – Noise

MM #	MM Title	Monitoring/ Reporting Action	Timing & Method of Verification	Agency or County Responsibilities	Applicant Responsibilities
NOISE-1	Prepare Construction Noise Control Plan	Prepare and implement approved Construction Noise Control Plan to minimize and avoid noise from construction activities to the maximum extent feasible.	Prior to the issuance of Zoning Clearance.	County Plan review and approval. County monitors compliance	Prepare Plan and obtain County approval. Conduct noise modelling for remaining well pads and determine mitigation, if required. Conduct weekly noise monitoring at NSRs during well drilling to ensure accuracy of modelling. Implement noise reduction techniques. Resolve public noise complaints and inform the County of complaint resolution within 48 hours.
NOISE-2	Maintenance Noise Control Plan	Avoid noise from workover drilling activities to the maximum extent feasible	Prior to the issuance of Zoning Clearance.	Plan review and approval County monitors compliance	Implement noise reduction techniques. Limit workover drilling of wells developed under the proposed Project to no more than three (3) annually where occupied sensitive receptors are affected by nighttime noise levels greater than 3 dBA over ambient.
NOISE-3	Prepare Cumulative Construction Noise Control Plan	Prepare and implement approved Cumulative Construction Noise Control Plan to minimize and avoid noise from cumulative construction activities to the maximum extent feasible.	Prior to the issuance of Zoning Clearance 2nd and 3rd projects to request Zoning Clearance.	County Plan review and approval. County monitors compliance	Prepare Plan and obtain County approval. Implement noise reduction techniques. Resolve public noise complaints and inform the County of complaint resolution within 48 hours. No cumulative well drilling to occur within 0.25 miles of sensitive receptors.

Table 7-1h. Mitigation Monitoring and Reporting Plan – Surface and Groundwater Resources

MM #	MM Title	Monitoring/ Reporting Action	Timing & Method of Verification	Agency or County Responsibilities	Applicant Responsibilities
SGW-1	Erosion and Sediment Control Plan	Develop and implement Erosion and Sediment Control plan.	Prior to, during and post-construction	County reviews and approves Plan, conducts site inspections, and reviews inspection reports to assure compliance with the Plan. County may require modifications or remedial action depending on the results of inspections.	Submit Erosion and Sediment Control Plan to County P&D for review prior to issuance of Zoning Clearance. Implement Plan, including required inspections and reporting to the County on a schedule to be developed with P&D. Perform regular maintenance and implement remedial actions as necessary.
SGW-2	Flood Protection Plan	Develop and implement Flood Protection Plan.	Prior to, during, and post-construction	County reviews and approves Flood Protection Plan. County reviews inspection reports to assure compliance with the Plan. County may require modifications or remedial action depending on the results of inspections.	Submit a Flood Protection Plan to the County for review prior to issuance of Zoning Clearance. Plan requirements shall be implemented in proposed Project design and during construction, including required inspections and reporting to the County on a schedule to be developed with the County. Perform regular maintenance and implement remedial actions as necessary.
SGW-3	Locate Abandoned Wells and Verify Abandonment Seals	Records search to locate abandoned wells and verify seal integrity.	Prior to steam injection	County and DOGGR to review and approve results of research and seal integrity verification.	Develop and implement a review of seal integrity of all abandoned wells in West Cat Canyon Oil Field. Submit the results of research and seal integrity verification of abandoned wells to the County and DOGGR at least 60 days prior to steam injection.

Table 7-1i. Mitigation Monitoring and Reporting Plan – Traffic/Transportation

MM #	MM Title	Monitoring/ Reporting Action	Timing & Method of Verification	Agency or County Responsibilities	Applicant Responsibilities
TR-1	Develop Vehicle Safety Plan	Develop and implement approved Vehicle Safety Plan to minimize safety impacts to the circulation system to the maximum extent feasible.	Prior to the issuance of Zoning Clearance.	Plan review and approval Review traffic controls along haul routes County monitors compliance	Prepare Vehicle Safety Plan Implement traffic control techniques.
TR-2	Roadway Maintenance Agreement	Enter into a Roadway Maintenance Agreement regarding pavement or other infrastructure damage caused by the net increase in daily haul trucks	Written commitment provided prior to issuance of the Zoning Clearance. Executed Roadway Maintenance Agreement prior oilfield production activities.	County reviews written commitment and semi-annual FPP status reports. County reviews and executes Agreement with Owner/Operator. County monitors compliance.	Owner/operator submits written commitment to implement requirements of MM TR-2. Executes a Roadway Maintenance Agreement with County regarding pavement or other infrastructure damage caused by the net increase in Project-related daily haul trucks. Adhere to all Agreement requirements.
TR-3	Construction Traffic Control Plan	Approve and implement Construction Traffic Control Plan during construction of the natural gas pipeline to minimize and avoid impacts to the circulation system to the maximum extent feasible.	Prior to the issuance of Zoning Clearance.	Plan review and approval County monitors compliance	Prepare Construction Traffic Control Plan. Implement traffic control techniques during construction of natural gas pipeline.