



California Public Utilities Commission **TL 695 and TL 6971 Reconductor Project**

Mitigation Monitoring, Compliance, and Reporting Plan

January 2019

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California Public Utilities Commission

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ACRONYMS AND ABBREVIATIONS

APM	applicant proposed measure
BMP	best management practice
Cal-IPC	California Invasive Plant Council
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
Caltrans	California Department of Transportation
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CHRIS	California Historical Resources Information System
CPUC	California Public Utilities Commission
EI	Environmental Inspector
EM	Environmental Monitor
FAA	Federal Aviation Administration
GIS	geographic information systems
kV	kilovolt
MM	mitigation measure
MMCRP	Mitigation Monitoring, Compliance, and Reporting Plan
MMRP	Mitigation Monitoring and Reporting Program
MPR	Minor Project Refinement
NAHC	Native American Heritage Commission
NOT	Notice of Termination
NPDES	National Pollutant Discharge Elimination System
NTP	Notice to Proceed
PEA	Proponent's Environmental Assessment
PRC	Public Resources Code
PTC	Permit to Construct
ROW	right-of-way
RWQCB	Regional Water Quality Control Board
SDG&E	San Diego Gas and Electric Company
SF ₆	sulfur hexafluoride
SWCRB	State Water Resources Control Board
SWPPP	Stormwater Pollution and Prevention Plan
US	United States
USACE	US Army Corps of Engineers
USFWS	US Fish and Wildlife Service

1 INTRODUCTION

1.1 PROJECT OVERVIEW

On April 22, 2016, San Diego Gas and Electric Company (SDG&E; the Applicant) submitted Application 16-04-022 for a Permit to Construct (PTC) the Tie-Line (TL) 695 and TL 6971 Reconductor Project (project) with the California Public Utilities Commission (CPUC). The project involves reconductoring approximately 8.41 miles of 69-kilovolt (kV) power line conductor on TL 695 and TL 6971, replacing existing wood pole structures with new steel pole structures, and installing a new 0.09-mile underground 69-kV power line. In addition, 1.74 miles of existing TL 695 will be taken out of service and removed. The total length of the project will be approximately 10.24 miles.

The CPUC prepared an Initial Study/Mitigated Negative Declaration (IS/MD), pursuant to the California Environmental Quality Act (CEQA), the amended State CEQA guidelines (14 California Resources Code 15000 et seq.), and the CPUC CEQA Rule 2.4, to address the potential impacts of the project and the environment. On May 1st, 2017, the CPUC issued a Draft IS/MND for a 30-day public review and comment period. Responses to all comments received on the Draft IS/MND were included in Section 5 of the Final IS/MND along with minor changes to the Draft IS/MND based on the comments that were received. The CPUC adopted the Final IS/MND (State Clearinghouse No. 2017051003) and granted SDG&E's PTC the approved project on March 22, 2018, in accordance with Public Resources Code (PRC) § 15074.

1.1.1 Project Description

The project involves reconductoring approximately 8.41 miles of 69 kilovolt (kV) power line conductor on TL 695 and TL 6971 between the Talega, Basilone, and Japanese Mesa Substations, replacing existing wood pole structures with new steel pole structures, and installing a new underground power line. Reconductoring will take place within the Talega, Basilone, and Japanese Mesa Substations. The total length of the proposed project would be approximately 10.24 miles. SDG&E anticipates construction of the proposed project would take approximately 8 months. Construction is estimated to start in the first quarter of 2019.

1.1.1.1 Staging Yards

SDG&E anticipates utilizing six staging yards for materials laydown and temporary storage. Site preparation activities at staging yards may include mowing and installing chain-link fence around the staging yard, if required. Staging yards may be used for the following activities:

- Refueling construction equipment, vehicles, and helicopters
- Maintenance/repair of construction equipment and vehicles
- Short-term helicopter operations

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- Assembling pole structures
- Laydown and storage of materials and equipment
- Parking personal vehicles
- Housing construction trailers and portable restrooms
- Worker meet-up

1.1.1.2 Stringing Sites

Stringing sites would be used to install conductor on pole structures and would generally be located at the ends of straight power line segments where the line changes direction. Vegetation removal and minor grading activities may occur within the stringing sites.

1.1.1.3 Structure Work Areas

Structure work areas would be used for equipment and vehicles access, and material laydown during pole installation. Work areas would be subject to minor earthwork and vegetation trimming or removal.

1.1.1.4 Access Roads

Most work areas would be accessed via existing unpaved roads; however, one new 50-foot-long permanent, unpaved access road would be constructed. Temporary overland routes and footpaths would be developed to access pole sites where necessary.

1.1.1.5 Helicopter Use

Helicopters may be used for:

- Removal of existing conductors and pole structures
- Foundation installation for new pole structures
- Erection of new pole structures
- Stringing of new conductors and fiber optic cable
- Transporting equipment and personnel

Staging yards and helicopter ILAs may be used for refueling. Helicopter maintenance and repair would occur at local airports.

1.1.1.6 Construction Schedule

The project is anticipated to take approximately 8 months to construct. Construction is estimated to begin in the first quarter of 2019.

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1.2 MITIGATION MONITORING, COMPLIANCE, AND REPORTING PLAN

1.2.1 Authority

SDG&E is required to implement applicant proposed measures (APMs) and mitigation measures (MMs) specified in the Final IS/MND, as well as to obtain and implement various agency permits applicable to the project, in order to avoid or reduce potentially significant impacts on the environment. As the CEQA lead agency, the CPUC is responsible for monitoring and enforcing compliance with these requirements, and to adopt a reporting or monitoring program, pursuant to PRC § 21081.6 and Section 15097 of the CEQA Guidelines. Chapter 4 of the IS/MND included a Mitigation Monitoring and Reporting Program (MMRP) that describes a recommended framework for preparing and implementing a Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP) prior to construction of the project. The CPUC adopted the MMRP framework with its decision on the project.

This MMCRP was prepared pursuant to the adopted MMRP, and in accordance with PRC § 21081.6 and Section 15097 of the CEQA Guidelines. SDG&E was consulted during development of the MMCRP and given an opportunity to comment on its contents. SDG&E's comments have been incorporated into the Final MMCRP. The contents of the MMCRP may be updated if necessary to further clarify expectations, add new procedures, or revise procedures.

1.2.2 Contents

The contents of the MMCRP are intended to:

- Ensure project impacts on the environment are avoided or reduced as specified in the IS/MND
- Summarize all mitigation requirements that would be monitored by the CPUC
- Organize the mitigation requirements by category and implementation phase for clarity
- Identify the roles and responsibilities for key project personnel on the SDG&E compliance team and the CPUC monitoring team
- Establish clear expectations for the SDG&E and CPUC teams by identifying specific procedures

1.2.3 Schedule

The proposed construction schedule for the project and duration of work for key features is presented in Table 1.2-1. The actual construction schedule may vary slightly. SDG&E is responsible for informing the CPUC of any substantial changes to the proposed construction schedule well in advance. SDG&E shall provide the CPUC with construction schedule updates on a frequent basis during construction (refer to Section 4.1.8).

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Table 1.2-1 Estimated Overall Construction Schedule

Construction Activity	Duration (days)
Staging Yard Preparation	30
Access Road Improvements	30
Vegetation Removal and Trimming	30
Concrete Pier and Micropile Foundation Construction	50
Direct-Bury Foundation Construction	90
Pole Structure Installation	90
Conductor Stringing	60
Underground Power Line Construction	10
Demobilization and Cleanup	40

Implementation of the MMCRP will end when the CPUC Project Manager determines there is no further need for CPUC monitoring of the project. SDG&E is required to perform restoration monitoring until the habitat restoration areas are fully restored to pre-construction conditions (specified in MM Biology-8: Restoration for Temporarily Impacted Habitat).

2 SUMMARY OF REQUIREMENTS

2.1 REQUIREMENT SOURCES

The scope of requirements addressed in the MMCRP primarily originate from the APMs and MMs identified in the IS/MND, as well as the federal, state, and local permits and authorizations described in the IS/MND, that would have a mitigating effect on the project's environmental impacts. In addition to the requirements described in the IS/MND, the MMCRP identifies procedural requirements to verify and document implementation, as well as communication protocols for the SDG&E and CPUC project teams (refer to Section 4, Procedures).

Table 1 located in Appendix A lists all APMs and MMs from the adopted MMRP. This table includes the following information:

- Titles and full text of the required APMs and MMs
- Applicable locations where implementation would occur
- Performance standards, and applicable timing and implementation phase
- MMCRP tracking references

Federal, state, and local agencies have jurisdiction over lands and resources in the project area. Potentially applicable permits are identified in the IS/MND Project Description, and several APMs and MMs include requirements to obtain permits and/or agency authorizations.

2.2 REQUIREMENT CATEGORIES AND IMPLEMENTATION PHASES

The project requirements addressed in the MMCRP can be separated into eight categories, which are applicable during one or more implementation phase (e.g, Before Construction, During Construction, After Construction)¹. Requirement categories for the project are summarized as follows:

¹ Some requirements are applicable following construction, and there are nine mitigation measures with requirements applicable during the operation and maintenance phase. These operation and maintenance requirements are conditions of authorization under the purview of MCB CPEN, as well as in compliance with SDG&E's Subregional Natural Community Conservation Plan (NCCP) Standard Operational Protocols.

2 SUMMARY OF REQUIREMENTS

- **Permits and Authorizations.** Requirements that involve obtaining a permit or authorization from the CPUC or another agency, or otherwise consulting with an agency prior to an activity.
- **Plans.** Requirements that involve preparing project plans specified in the IS/MND or permits, and submitting such plans to CPUC and jurisdictional agencies for review and approval, where specified.
- **Notifications.** Requirements that involve notifying the public, CPUC, or other agencies prior to initiating specific project activities, or if issues or the need for changes arise.
- **Worker Training.** Requirements that involve training workers on resource avoidance, impact minimization, communication procedures, and other project requirements.
- **Surveys.** Requirements that involve surveying project areas prior to or during construction to identify potentially sensitive environmental resources.
- **Field Monitoring.** Requirements that involve field monitoring (e.g., inspection or observation) during construction in sensitive areas, or when sensitive resources could be encountered.
- **Avoidance and Minimization.** Requirements that involve specific activities to avoid or minimize impacts on sensitive resources.
- **Reporting.** Requirements that involve documenting and/or reporting construction or compliance activities.

2.2.1 Permits and Authorizations

Table B-1, located in Appendix B, summarizes permits and authorizations that SDG&E may be required to obtain from the CPUC and other jurisdictional agencies prior to an activity. The actual need for such permits and authorizations would be determined by the jurisdictional agencies. Table B-1 will be used to track the status of permits and authorizations (refer to Section 5.1.1, Tracking Systems).

Some permits for the project may include their own subset of requirements, including plans, notifications, worker training, field monitoring, impact avoidance and minimization measures, and reporting. Where applicable, permit requirements will be incorporated into the associated requirement tracking tables addressed in this section and located in Appendix B.

2.2.2 Plans

Several of the project APMs and MMs (refer to Table A-1) require SDG&E to prepare project-specific plans to guide the implementation of complex mitigation requirements during one or more project phases. Table B-2, located in Appendix B, lists project plans and placeholders for agency submittal and approval dates. Some of the plans would only be required under certain conditions, as specified in the source APM or MM. Table B-2 will be used to track the status of plans for the project, and will be updated on an ongoing basis throughout implementation of the MMCRP.

2 SUMMARY OF REQUIREMENTS

Project plans require varying levels of review from jurisdictional agencies; however, CPUC review and approval is required for all final versions of plans identified in Table B-2. If agency review of a plan is required, SDG&E must submit each agency's comments to the CPUC so the CPUC may verify that the comments were adequately addressed. If plans are revised following CPUC approval, the revised plans must be recirculated for review and comment to all agencies with applicable oversight responsibilities.

As with permits, some project plans include their own subset of requirements, including notifications, worker training, monitoring, impact avoidance and minimization measures, and reporting. Where applicable, plan requirements will be incorporated into the associated requirement tracking tables addressed in this section and located in Appendix B.

2.2.3 Notifications

Table B-3, located in Appendix B, lists required notifications, entities to notify, and the dates of notification. SDG&E will provide documentation to the satisfaction of the CPUC. MMCRP procedures addressed in Section 4 include notification timelines for certain events. These notifications will be tracked separately from the notifications addressed in Table B-3.

2.2.4 Worker Training

2.2.4.1 Environmental Training Program

Multiple APMs, MMs, and project plans specify worker training and communication procedures either prior to working on the site or during morning tailboard meetings. SDG&E is responsible for preparing training materials and implementing an environmental training program (ETP) for workers and other project personnel. Worker training requirements are summarized in Table 2.2-1.

All project personnel, including construction workers and compliance monitoring workers, must participate in the ETP prior to working on the project site. Personnel who have not participated in the ETP must be escorted by a designated SDG&E or CPUC representative who has received the full ETP training. SDG&E will determine the appropriate levels of training and escort for delivery drivers and site visitors.

2 SUMMARY OF REQUIREMENTS

Table 2.2-1 Summary of Worker Training Requirements

Requirement Sources	Training Topics
MM Biology-1: Environmental Awareness Training	Training shall include: information about thread-leaved brodiaea and avoidance requirements.
MM Biology-3: Worker Training	Training shall include: special-status plant and wildlife species and sensitive habitats; requirements and boundaries of the project and the importance of complying with mitigation measures; penalties for violations of environmental law.
MM Cultural-4: Worker Training	Training shall include: the potential for exposing subsurface resources, basic signs of a potential resource, and required procedures to be followed upon the discovery or suspected discovery of archaeological materials, human remains, and fossil remains; requirements for working within the San Mateo Archaeological District (SMAD) and all other resources as defined in the 2015 HDR, Inc. "Recommendations for Cultural Resources Protection and Avoidance" Report.
MM Hazards-1: Hazardous Substance Management and Emergency Response Plan	Training shall include: specific procedures for hazardous materials and emergency response.
MM Hazards-3: Unexploded Ordnance and Worker Safety Training	Training shall include: the potential for encountering unexploded ordnance (UXOs), and the protocols to follow in such an event.

2.2.4.2 Levels of Training

Due to variations in the types of workers and duration of time they may spend on site, different levels of training may be provided, each with graduated levels of access to the project site. Access to some site locations may be restricted to those who have had the appropriate level of training.

Different training levels may be acceptable for delivery drivers and site visitors, depending on access location, presence of fully trained personnel, and risk of encountering resources or hazards. SDG&E will determine the appropriate levels of training and escort for delivery drivers and site visitors.

2.2.5 Surveys

Multiple APMs and MMs, as well as project permits and plans, require SDG&E to complete field-based survey requirements, such as formal or protocol level surveys, reconnaissance inventories and evaluations, or clearances. The frequency, timing, and formality of the survey requirements vary depending on the targeted resource and implementation phase. Survey requirements for the project are summarized in Table 2.2-2 by resource topic. In the case where the exact wording of the mitigation measures or APMs presented in Appendix A, Table 1 differ from the table below, the language in the CPUC approved mitigation measures and APMs take precedence.

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Table 2.2-2 Summary of Survey Requirements⁺

Resource/Topic	Requirement Sources	Freq. Before Construction	Freq. During Construction	Freq. After Construction
NCCP	MM Biology-4	Once ^a	Ongoing*	--
Arroyo toad	MM Biology-5	Three times	One-three times	--
Nesting birds (e.g., special-status and protected migratory birds)	MM Biology-6	Once	Approximately weekly during nesting season ^b	--
Coastal California gnatcatcher	MM Biology-7	Once	--	--
Temporarily impacted habitat	MM Biology-8	Once	--	--
Compensated habitat*	MM Biology-9	Once*	--	--
Western burrowing owl	MM Biology-10	Once ^a	--	--
Pacific pocket mouse	MM Biology-11	Once	--	--
Weed inventory	MM Biology-12	Once	Annually during construction	Annually for 2 years
Vernal pool*	MM Biology-13	Once*	--	--
Geotechnical investigation	MM Geology-1	Once	--	--
Unexploded ordnance	MM Hazards-3	Once	--	--
Trail condition assessment	MM Recreation-2	Once	--	--
Road condition assessment	MM Traffic-1	Once	--	--

Notes:

⁺ In the case where the exact wording of the mitigate measures or APMs presented in Appendix A, Table 1 differ from the above Table, the language in the APUC-approved mitigation measures and APMs take precedence.

^a If construction is delayed for more than 30 days or otherwise specified, pre-construction surveys may need to be repeated, as determined through coordination with CPUC, and potentially USFWS and CDFW.

^b The nesting bird season is generally from January 1 through August 31, but may be earlier or later depending on species nesting patterns and weather conditions.

* Requirements marked with an asterisk are only applicable under specified conditions, as noted in the requirement source.

SDG&E’s requirements relative to pre-construction surveys, including survey documentation and submittal, are described in Table 1 in Appendix A. SDG&E is required to submit pre-construction survey results (in some cases reports) to the CPUC, and if necessary USFWS and CDFW prior to initiating construction or any other site development activities.

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Surveys must be completed by individuals having the qualifications described in Table 1 in Appendix A. In certain instances, as described in Table 1 in Appendix A, survey personnel must be approved by the CPUC, USFWS, CDFW, and/or MCB CPEN. Surveyor requirements are the same as those described for specialty monitors addressed in Section 2.2.7.

Table B-3, located in Appendix B, lists the timing and frequency of required surveys, and will serve as an implementation table for these requirements. Table B-3 will be used to track the status and results of surveys, and will also address the need for any monitoring or avoidance and minimization requirements due to the presence of a resource. Table B-3 will be updated on an ongoing basis throughout implementation of the MMCRP. Survey requirements will be complete when SDG&E provides the survey documentation specified in Table 1 in Appendix A.

2.2.6 Field Monitoring

In addition to the general mitigation monitoring effort addressed in the MMCRP, SDG&E is required to assign specific on-site monitoring duties to select personnel. Several project APMs and MMs include specific on-site monitoring requirements that must be performed during or following construction to ensure impacts to resources are reduced or avoided. There are two types of monitoring requirements for the project, specialty monitoring and general monitoring, which are both discussed further below.

Monitoring requirements may depend on the presence of sensitive resources identified during surveys listed in Table 2.2-2. The results of surveys and presences of resources will be tracked in Table B-3.

2.2.6.1 Specialty Field Monitoring

Specialty monitors are required to perform the majority of the monitoring requirements for the project. Personnel performing these tasks must meet the minimum qualifications identified in the associated APMs and MMs contained in Table 1 in Appendix A. In addition, agency approval is required for certain specialty monitors performing these roles (refer to Table 1 in Appendix A).

2.2.6.2 General Field Monitoring

Any qualified and designated personnel may perform monitoring tasks where there is no discipline or agency approval requirements specified. Personnel performing these roles must be provided the necessary training beyond the minimum worker training requirements covered in the ETP (refer to Table 2.2-1).

2.2.7 Avoidance and Minimization

All APMs and MMs, as well as project permits and plans, contain general impact avoidance and minimization goals; however, some requirements from these sources include specific actions to implement if resources are identified during pre-construction surveys or construction clearances. This section addresses avoidance and minimization requirements that will be implemented during construction and restoration activities to avoid or minimize impacts to

2 SUMMARY OF REQUIREMENTS

resources that are present. Impact avoidance and minimization requirements for the project can be summarized by the following actions:

- Avoiding sensitive areas by communicating to workers and through the installation of signs, flagging, and/or barriers
- Avoiding sensitive periods or seasons (e.g., nighttime, wet season, or reproductive seasons)
- Using specific work techniques, materials, or equipment known to reduce impacts
- Scheduling work activities during less sensitive periods or seasons
- Providing ongoing reminders and environmental training to workers

The applicability of avoidance and minimization requirements may depend on the presence of sensitive resources identified during surveys listed in Table 2.2-2. The results of surveys and presences of resources will be tracked in Table B-3.

2.2.8 Reporting

Reporting is a key element of the MMCRP for both documentation and communication purposes, and both SDG&E and CPUC are responsible for reporting requirements.

2.2.8.1 SDG&E

SDG&E is responsible for preparing general MMCRP reports to document all construction and compliance activities, as well as specific reports identified in APMs and MMs. Reporting activities may also be required by permits and plans. Table 2.2-5 summarizes SDG&E's specific reporting requirements specified in APMs and MMs, and/or project plans. Table 2.2-6 summarizes SDG&E's general reporting requirements associated with the compliance effort.

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Table 2.2-3 Summary of Specific SDG&E Reporting Requirements*

Report	Preparation/Submittal Frequency	Requirement Sources ^a	Contents
Before Construction			
Special-status Plant Survey Report(s)	Thread-leaved brodiaea populations are recorded*.	MM Biology-1: Avoidance and Minimization of Impacts on Special-Status Plants	<p>SDG&E shall mark all thread-leaved brodiaea populations within the PSA as environmentally sensitive areas on maps that are provided to construction contractors working near environmentally sensitive areas.</p> <p>SDG&E shall maintain a library of rare plant locations known to SDG&E occurring within the easements and fee owned properties. "Known" means a verified population either extant or documented using record data. Information on known sites may come from a variety of record data sources including Habitat Conservation Plans, pre-activity surveys, MCB CPEN surveys, or surveys conducted for environmental compliance.</p> <p>If the plant species cannot be avoided, SDG&E shall notify USFWS, CDFW, MCB CPEN, and the CPUC in writing, and SDG&E shall implement procedures for salvage and relocation of the plant species.</p>
"Take" of arroyo toad*	Information collected during "take" activities is reported to MCB CPEN Assistant Chief of Staff (AC/S) Environmental Security (ES), the CPUC, and USFWS.	MM Biology-5: Arroyo Toad Avoidance and Minimization*	Report the capture and release locations of all arroyo toads found and relocated to MCB CPEN Assistant Chief of Staff (AC/S) Environmental Security (ES), the CPUC, and USFWS.
Nesting birds	Nest survey results shall be provided to CPUC, MCB CPEN, USFWS, and CDFW prior to initiating construction activities.	MM Biology-6: Mitigation for Bird Species	Refer to MM Biology-6 in Table 1 in Appendix A.

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Report	Preparation/Submittal Frequency	Requirement Sources ^a	Contents
Coastal California gnatcatcher	Provide an electronic report of nest survey results to the CPUC and MCB CPEN within 7 days of survey completion.	MM Biology-7: Coastal California Gnatcatcher Avoidance and Minimization	Not specified.
Habitat restoration	Submit memo to the CPUC and MCB CPEN 30 days prior to impacts within habitat restoration and mitigation sites.	MM Biology-8: Restoration for Temporarily Impacted Habitat	Document the pre-construction conditions of each restoration or mitigation site in a pre-construction habitat restoration and mitigation area impact memo.
Habitat compensation	<p>Option 1 (NCCP off-set): SDG&E shall provide the CPUC with a letter from CDFW and USFWS stating that enough mitigation credits are available for this project at least 30 days prior to any ground-disturbing activities. SDG&E shall provide the CPUC with a copy of the Annual Report that shows that mitigation credits were used for this project.</p> <p>Option 2 (purchase/dedication to off-set): SDG&E shall submit a Habitat Acquisition Plan at least 30 days prior to any ground-disturbing activities for CPUC, USFWS, CDFW, and MCB CPEN (as applicable) review and approval.</p>	MM Biology-9: Compensation for Permanently Impacted Habitat	Refer to MM Biology-9 in Table 1 in Appendix A.

2 SUMMARY OF REQUIREMENTS

Report	Preparation/Submittal Frequency	Requirement Sources ^a	Contents
Weed Inventory	Pre-construction weed inventory.	MM Biology-12: Invasive Weed Control	Inventory a 10-foot buffer along access roads that are solely utilized by SDG&E and proposed work areas for the project, as well as at all ancillary facilities associated with the proposed project where ground-disturbing activities are proposed to occur outside of secured facilities (i.e., substations) for weed populations that are (1) considered by MCB CPEN as being a priority for control (i.e., prohibited plants on the Basewide Master Plant List), or (2) weed populations rated High or Moderate for negative ecological impact in the California Invasive Plant Inventory (online) Database (http://www.cal-ipc.org/ip/inventory/index.php) that are not already pervasive within and around the project area. Only species on the above-mentioned lists that have isolated occurrences and fall within project impact areas will be mapped and targeted for control.
Pre-Project Trail Condition Report	Pre-Project Trail Condition Report is submitted to the CPUC 30 days prior to construction.	MM Recreation-2: Pre- and Post-Project Trail Condition Report	Report documents the condition of City of San Clemente trails located within project access roads.
Pre-Project Road Condition Assessment	Conduct a pre-construction road condition assessment and submit to the CPUC and the City of San Clemente, and to MCB CPEN upon request.	MM Traffic-1: Pre-Construction Road Condition Assessment and Repair	Report on the Pre-Project Road Condition Assessment shall include photographs taken in the field at each entrance, exit, and pavement disturbance location.

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Report	Preparation/Submittal Frequency	Requirement Sources ^a	Contents
During Construction			
"Take" of arroyo toad	Information collected during "take" activities.	MM Biology-5: Arroyo Toad Avoidance and Minimization	The qualified biologist shall contact MCB CPEN AC/S ES, the CPUC, and USFWS regarding any arroyo toad sighting within the project footprint. Any incidental excavation, capture and relocation, injury, or death of arroyo toads in association with project activities shall be reported immediately to MCB CPEN AC/S ES, the CPUC, and USFWS. Upon notification of a toad sighting, the qualified biologist shall notify the USFWS and report the notification to MCB CPEN AC/S ES, and the CPUC. Any type of "take" of toads, which includes digging up, handling (i.e., relocating the toad), injury, or death shall not occur without a valid "take" permit.
Nesting Bird Reports ^b	A monthly written report shall be submitted to the CPUC, MCB CPEN, CDFW, and USFWS for construction within a reduced buffer occurring within the avian nesting season (generally between January 1 and August 31). Final report shall be submitted to the CPUC, MCB CPEN, CDFW, and USFWS at the end of each nesting season.	MM Biology-6: Mitigation for Bird Species	A monthly written report shall be submitted to the CPUC, MCB CPEN, CDFW, and USFWS for construction within a reduced buffer and shall include (1) information included in buffer reduction requests, (2) work (eggs, young, and adults). No avian reporting shall be required for construction occurring outside of the nesting conducted within the work site, (3) duration of work activities and related buffer reduction, and (4) information on nest success season and if construction activities do not occur within a reduced buffer during any calendar month. Final report shall summarize all avian-related monitoring results and outcomes for the duration of project construction.

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Report	Preparation/Submittal Frequency	Requirement Sources ^a	Contents
Coastal California gnatcatcher	The avian biologist will provide bi-weekly (every two weeks) biological monitoring reports (electronic versions only), and one final biological monitoring report, to the CPUC, MCB CPEN, CDFW, and the USFWS.	MM Biology-7: Coastal California Gnatcatcher Avoidance and Minimization	Not specified.
Pacific pocket mouse	Provide bi-weekly electronic biological monitoring reports, and one final biological monitoring report to the CPUC, MCB CPEN Environmental Security, and USFWS. Any "take" will be reported electronically to the CPUC, MCB CPEN ES, CDFW and USFWS within 24 hours of the action.	MM Biology-11: Mitigation for Pacific Pocket Mouse	Not specified.
Construction Mitigation Report	Prepared and submitted on an annual basis to CPUC, USFWS, and MCB CPEN.	MM Biology-14: Access Road Grading Measures*	SDG&E will provide MCB CPEN Consultation Section with the acreage of temporary and permanent habitats impacted by the project. The report will also include the table associated with MCB CPEN project habitat impacts provided to the USFWS in their Annual Report.
Construction Incidental Take Reports*	Prepared and submitted on an annual basis to CPUC, USFWS, and MCB CPEN.	MM Biology-14: Access Road Grading Measures*	In the event of unavoidable impacts resulting in Take as authorized under USFWS ESA Section 10(a) Permit (References [e] and [f]), SDG&E shall prepare an annual Take report.

2 SUMMARY OF REQUIREMENTS

Report	Preparation/Submittal Frequency	Requirement Sources ^a	Contents
Cultural Resources Discovery Report*	Notification of inadvertent discoveries shall be provided to the CPUC, MCB CPEN archaeologist (if the resource is found on MCB CPEN), and participating Native American tribes (if necessary) within two days of the find. Any treatment other than preservation in place must be approved by the CPUC, appropriate tribe, and MCB CPEN's archaeologist. The resource and treatment method shall be documented in a final report to be filed with the California Historical Resources Information System (CHRIS).	MM Cultural-3: Discoveries of Cultural Resources	Report shall document the resource and treatment method.
Human Remains Report*	Inadvertent discovery requires notification of CPUC-approved cultural resources specialist/archaeologist, SDG&E, and MCB CPEN (if the find is within MCB CPEN).	MM Cultural-5: Procedure for Discovery of Human Remains	A report of the results of the treatment and disposition of the remains is submitted to MCB CPEN if the remains are found within MCB.
Paleontological Report*	Inadvertent discoveries shall be reported to the CPUC and MCB CPEN cultural resource specialist (if the resource is found on MCB CPEN).	MM Paleo-2: Evaluation and Treatment of Previously Undiscovered Paleontological Resources	The report shall include discussions of the methods used, stratigraphy exposed, fossils collected, and significance of recovered fossils. The report shall also include an itemized inventory of all collected and catalogued fossil specimens. A plan for protection of the unique resource shall be provided to CPUC and MCB CPEN (if required) for review and approval.

2 SUMMARY OF REQUIREMENTS

Report	Preparation/Submittal Frequency	Requirement Sources ^a	Contents
Blasting Reports*	Blasting plans shall be submitted to MCB CPEN for review and approval before blasting at each site. MCB CPEN-approved Blasting Plans shall then be submitted to the CPUC for review at least two weeks prior to blasting at each site.	MM Hazards-2: Site-Specific Blasting Plan	SDG&E's contractor shall prepare daily blasting-related reports that include: Blast Report, Seismograph Monitoring Report, Inspection Report, Blasting Complaint Report, and Pre-Blast Inspection Report.
SWPPP Visual Inspection and Storm Reports	Prepared for each qualifying rain event (QRE) (0.5 inch or more of precipitation within a 48 hour or greater period between rain events) and for non-stormwater discharges. Submitted to the Regional Water Board in the annual report and available to the CPUC on the Regional Water Board SMARTS website until SWPPP coverage is complete ^c .	MM Hydrology-1: SWPPP Development and Implementation MM Hydrology-2: SWPPP Monitoring Program SWPPP	Visual inspection observations, proposed erosion and sediment control details, any corrective actions, the results of water quality sampling, and analysis of stormwater discharges associated with the project site applicable to projects that are determined to be a risk level 2 or greater.
SWPPP Numeric Action Level (NAL) Exceedance Reports*	Prepared when values for parameters for pH and turbidity are exceeded and submitted to the Regional Water Board. The reports will be available on the Regional Water Board SMARTS website.		Sampling methodology, a description of the best management practices (BMPs) associated with the sample that exceeded the NAL and the proposed corrective actions taken. This is applicable to projects determined to be a risk level 2 or greater.
SWPPP Annual Reports	Prepared annually for each year of SWPPP coverage and available to the CPUC on the Regional Water Board SMARTS website until SWPPP coverage is complete if the Project is a Risk Level 2 discharger ^c .		Stormwater data, evaluations, required forms, a summary of all corrective actions taken during the compliance year, and identification of any compliance activities or corrective actions that were not implemented.

2 SUMMARY OF REQUIREMENTS

Report	Preparation/Submittal Frequency	Requirement Sources ^a	Contents
BMP Monitoring Reports	<p>Reports shall be provided to the CPUC on a monthly basis throughout the duration of construction.</p> <p>Supply annual monitoring reports to the CPUC until the Construction General Permit requirements are met for filing of a Notice of Termination.</p>	MM Hydrology-2: Best Management Practices Inspection and Maintenance	Reports include descriptions of BMPs and an inspection checklist as described in General Permit 2012-0006-DWQ.
Monthly Noise Complaint Reports	Provide monthly reports CPUC within 15 days of the end of the month.	MM Noise-2: Notification and Complaints	Not specified.
After Construction			
Post-Construction Report(s)	Prepared and submitted on an annual basis on December 31 to CPUC, USFWS, CDFW, and MCB CPEN (for mitigation parcels to be acquired for impacts within MCB CPEN) until the habitat restoration areas are fully restored to pre-construction conditions.	MM Biology-8: Restoration for Temporarily Impacted Habitat	Not specified.
Post-Construction Monitoring Report	At completion of work.	MM Biology-14: Access Road Grading Measures	The Environmental Surveyor shall verify compliance, including observing that flagging areas have been avoided; identify previously unidentified dens, burrows, or plants located on any project sites after the pre-activity survey; and recording habitat acreages impacted by the project.

2 SUMMARY OF REQUIREMENTS

Report	Preparation/Submittal Frequency	Requirement Sources ^a	Contents
Archaeological Reports*	Inadvertent discoveries and proposed treatment shall be reported the CPUC, MCB CPEN archaeologist, and participating Native American tribes within two days of the find. Report will be submitted to the State Office of Historic Preservation upon project completion	MM Cultural-3: Discoveries of Cultural Resources* MM Cultural-6: Access Road Grading Measures*	Report shall include discussions of the methods used, locations, specimens discovered/collected, and significance of discovered/recovered specimens. The report shall also include an itemized inventory of all discovered, collected and catalogued specimens
Paleontological Summary Report*	Final summary report shall be completed	MM Paleo-2: Evaluation and Treatment of Previously Undiscovered Paleontological Resources*	Report shall include discussions of the methods used, stratigraphy exposed, fossils collected, and significance of recovered fossils. The report shall also include an itemized inventory of all collected and catalogued fossil specimens.
Post-Project Trail Condition Report	Prepared and submitted to CPUC once within 90 days of construction completion	MM Recreation-2: Pre- and Post-Project Trail Condition Report	Report documenting the final state of all City of San Clemente trails within project access roads.

Notes:

⁺ In the case where the exact wording of the mitigate measures or APMs presented in Appendix A, Table 1 differ from the above Table, the language in the APUC-approved mitigation measures and APMs take precedence.

^a Refer to the referenced measures for additional details regarding reporting requirements.

^b Monthly Nesting Bird Reports are not required if work does not occur within the preliminary buffers during the month as specified in MM Biology-5.

^c SWPPP coverage and reporting requirements typically begin with the start of construction and extend into the post-construction restoration period. SWPPP coverage ends when the project site is stabilized in accordance to Attachment C.1 of the Construction General Permit, and Notice of Terminations (NOTs) have been filed ending SWPPP coverage. SWPPP reports and other documents are submitted to the SWRCB via the SMARTS website, and can be downloaded by entering the project Wastewater Discharger Identification (WDID) Number located in the SWPPP.

* Requirements marked with an asterisk are only applicable under specified conditions.

2 SUMMARY OF REQUIREMENTS

Table 2.2-4 Summary of General SDG&E Reporting Requirements

Report	Preparation/Submittal Frequency	Requirement Sources	Contents
During Construction			
Weekly Compliance Summary Reports	Prepared and submitted to CPUC weekly during construction	MMCRP	Summary of Daily Compliance Reports with supporting photographs, , and a description of any important meetings during the reporting period. Any Incident Reports and supporting documentation shall be attached. The compliance summary reports will serve as the core method for SDG&E to communicate project activities to CPUC and to document their compliance effort.
Incident Reports	Prepared and submitted to CPUC within one business day of observation	MMCRP	Detailed description of incidents as described in Section 4.3.
After Construction			
Final Construction Compliance Report	Prepared and submitted to CPUC once within 90 days following construction	MMCRP	Summary of all construction and compliance activities that occurred prior to and during construction, summary of issues and resolutions, discussion of project outcomes and any lessons learned for future projects, and a status update for all project requirements (Table B-1 and requirement tracking tables).

2 SUMMARY OF REQUIREMENTS

2.2.8.2 CPUC

The CPUC is responsible for preparing general MMCRP reports to document the status and results of the mitigation monitoring effort, to summarize the information provided by SDG&E at an executive level, and to track important information about the project. Table 2.2-6 summarizes the CPUC’s general reporting requirements associated with the mitigation monitoring effort.

Table 2.2-5 Summary of General CPUC Reporting Requirements

Report	Preparation Frequency	Requirement Sources	Contents
Daily Inspection Reports	Prepared daily and submitted to CPUC monthly during construction, or upon request	MMCRP	Detailed description of the construction and compliance activities, as well as any issues, resolutions, and MMCRP procedures implemented, for each day CPUC Environmental Monitors (EMs) visits the site
Monthly Monitoring Summary Reports	Prepared and submitted to CPUC monthly during construction	MMCRP	Summary of Daily Monitoring Reports and SDG&E's Weekly Compliance Summary Reports and Checklists, important documentation provided by SDG&E (e.g., reports and logs), a description of any important meetings and discussions, and MMCRP procedures that were implemented during the reporting period
Post-construction Monitoring Report	Prepared and submitted to CPUC once following construction	MMCRP	Summary of all monitoring activities that occurred prior to and during construction, summary of issues and resolutions, discussion of project outcomes and any lessons learned for future projects, and a status update for all project requirements (Table B-1 and requirement tracking tables) with a summary of any remaining tasks that must be completed
Final Monitoring Report (if necessary)	Prepared and submitted to CPUC once to finalize MMCRP implementation	MMCRP	Summary of all monitoring activities that occurred following construction and compliance with requirements that were not documented as complete in the Post-Construction Monitoring Report The necessity of the report will be determined by the CPUC Project Manager

3 ROLES AND RESPONSIBILITIES

SDG&E and CPUC, including their contractors, are collectively responsible for implementing project requirements. CPUC is responsible for monitoring SDG&E's compliance by verifying that implementation is completed adequately, and enforcing appropriate corrective actions if the project is not in compliance.

This section describes specific SDG&E and CPUC roles and responsibilities for the project, and titles that will be assigned to personnel in these roles.

A list of designated personnel who will perform these roles, including their organization and contact information, will be located in Table C-1 located in Appendix C. Table C-1 shall be updated as needed throughout implementation of the MMCRP to reflect personnel changes.

3.1 SDG&E

3.1.1 SDG&E Compliance Team

3.1.1.1 SDG&E Project Manager

SDG&E is responsible for designating the project manager who will provide overall direction, management, leadership, and corporate coordination for the project. The SDG&E Project Manager's responsibilities shall include:

- Coordinating construction, engineering, and SDG&E's environmental personnel
- Integrating environmental responsibilities into all levels of the project organization
- Managing compliance with all APMs, MMs, permit conditions, plan requirements, and the MMCRP
- Communicating project activities, schedules, and public relations issues to the project teams

3.1.1.2 SDG&E Compliance Manager

SDG&E is responsible for designating a compliance manager to oversee the overall compliance effort. The SDG&E Compliance Manager shall be the lead SDG&E representative responsible for implementing environmental requirements and the MMCRP. The SDG&E Compliance Manager's responsibilities shall include:

- Understanding and planning for project requirements and construction needs
- Coordinating SDG&E's environmental personnel, and ensuring that qualified monitoring personnel are available and informed of their responsibilities, and have been approved by CPUC when applicable

3 ROLES AND RESPONSIBILITIES

- Communicating environmental requirements to the SDG&E Compliance Team and Construction Managers
- Communicating with the CPUC Monitoring Team regarding environmental requirements, construction needs, construction schedule changes, and MMCRP procedures described in Section 4
- Managing compliance with project requirements
- Reporting the effectiveness of mitigation and regularly submitting required reports and documentation to CPUC
- Providing leadership to correct any issues with environmental compliance

3.1.1.3 SDG&E Environmental Inspectors

SDG&E is responsible for designating at least one lead environmental inspector who will be regularly present at the project site to oversee and verify the compliance effort. The SDG&E Lead Environmental Inspector (LEI) shall work closely with construction personnel and shall be the primary field employee responsible for verifying and documenting environmental compliance. Multiple SDG&E LEIs may be needed to effectively monitor compliance during periods of high construction activity or high monitoring demand. The SDG&E LEI's responsibilities shall include:

- Understanding environmental project requirements and construction needs
- Taking direction from the SDG&E Compliance Manager
- Communicating construction needs and possible conflicts with environmental requirements to the SDG&E Compliance Manager
- Supporting construction staff to ensure work is conducted safely and in compliance with environmental requirements
- Overseeing specialty monitoring activities, or performing such duties when appropriate and approved to do so
- Implementing communication procedures described in the MMCRP
- Documenting that resources are avoided, and impacts are minimized as specified by all project requirements
- Determining the effectiveness of mitigation and reporting whether adjustments need to be made to the SDG&E Compliance Manager

3.1.1.4 SDG&E Specialty Monitors

SDG&E is responsible for designating personnel to perform required or as needed specialty monitoring requirements. Agency approval is required for several specialty monitoring roles as well as minimum qualifications. Specialty monitoring roles for the project are listed in Table 2.2-3 above, including minimum qualifications and agency approval requirements for designated personnel performing these roles if specified in the MND. EIs may also perform specialty monitoring roles if they possess the appropriate qualifications and experience, and have received applicable agency approval. Table C-2 located in Appendix C lists designated specialty monitors, their contact information, and dates of agency approval, if applicable.

3 ROLES AND RESPONSIBILITIES

3.1.1.5 SDG&E General Monitors

Several project requirements require general monitoring tasks. General monitoring can be conducted by any personnel if there are no minimum qualifications or agency approval requirements. General monitor requirements are listed in Table 2.2-4 above. Personnel performing these roles shall be provided training specific to the monitoring responsibility that is more detailed than the minimum worker training requirements included in the ETP (refer to Table 2.2-1). SDG&E EIs may perform general monitoring tasks in conjunction with their other inspection and monitoring duties if appropriate.

3.1.2 Construction Workforce

3.1.2.1 Construction Managers

SDG&E shall identify Construction Managers for the project who are responsible for work crews. Construction Managers shall provide support to the SDG&E Project Manager and oversee the activities of construction personnel. Construction Manager responsibilities include:

- Implementing contractor compliance with SDG&E specifications, construction contracts, and applicable codes
- Coordinating with SDG&E Compliance Personnel regarding implementation of project APMs and MMs, permit conditions, plan requirements, MMCRP procedures
- Planning construction activities around environmental requirements and reporting any potentially infeasible requirements and work area constraints to the SDG&E Compliance Team
- Communicating construction needs and schedule changes to the SDG&E Compliance Team
- Regularly facilitating field meetings with construction and environmental staff

3.1.2.2 Field Construction Advisors (FCAs)

At SDG&E's discretion, on-site responsibilities for Construction Managers may be delegated to FCAs. FCAs provide support to Construction Managers. FCAs shall be responsible for communicating with Construction Managers and SDG&E EIs to ensure day-to-day construction activities are conducted in compliance with all project requirements.

3.1.2.3 Construction Workers

Construction workers who enter the project site are responsible for following all environmental project requirements. Construction workers are responsible for attending required environmental trainings addressed in the ETP that are applicable to their position. Any questions regarding project requirements shall be directed towards SDG&E Construction Managers, SDG&E Construction Supervisors, and/or SDG&E EIs.

3 ROLES AND RESPONSIBILITIES

3.2 CPUC

3.2.1 CPUC Monitoring Team

3.2.1.1 CPUC Project Manager

The CPUC Project Manager is the lead representative for the CPUC and the sole CPUC employee on the CPUC Monitoring Team. The CPUC Project Manager shall oversee the mitigation monitoring effort and is responsible for making final determinations regarding MMCRP procedures, requirement clarifications, and compliance issues.

3.2.1.2 CPUC Monitoring Manager

CPUC is responsible for designating a monitoring manager who will support the CPUC Project Manager and provide oversight to the mitigation monitoring effort. The CPUC Monitoring Manager's responsibilities shall include:

- Reviewing CPUC monitoring reports and discussing non-compliance issues with the CPUC PM
- Reviewing reports and other documentation provided by SDG&E for MM compliance
- Reviewing NTPs, MPRs and Temporary Extra Work Space (TEWS) requests and submitting to CPUC PM for approval and sign-off
- Acting as a project liaison on the CPUC's behalf to work with SDG&E public affairs staff and address community issues and concerns when they arise
- Working with the SDG&E Compliance Personnel to resolve any issues and incidents
- Coordinating with other jurisdictional agencies as needed

3.2.1.3 CPUC Monitoring Supervisor

CPUC is responsible for designating a monitoring supervisor who will support the CPUC Project Manager and the CPUC Monitoring Manager by overseeing the day-to-day mitigation monitoring effort. The CPUC Monitoring Supervisor shall perform the delegated duties of the CPUC Monitoring Manager. The responsibilities of the CPUC Monitoring Supervisor include:

- Providing oversight of the CPUC Monitoring Team and conducting routine monitoring activities described in the MMCRP on behalf of the CPUC
- Implementing CPUC's responsibilities for MMCRP procedures, and verifying SDG&E fulfills their responsibilities
- Reviewing all pre-construction mitigation plans and preparing draft review memoranda for the CPUC PM, and keeping a record of MMCRP procedures
- Coordinating field personnel for the CPUC Monitoring Team to inspect the project site(s)
- Determining the appropriate frequency of site visits for CPUC environmental monitors (EMs)
- Conducting regular site visits at beginning of construction, with frequency adjusted as appropriate

3 ROLES AND RESPONSIBILITIES

- Verifying and documenting SDG&E's compliance with all project requirements prior to, during, and following construction, and creating an independent record of project compliance
- Documenting any incidents with compliance, reporting them to the CPUC PM, tracking the project compliance incidents record, and working with the CPUC Monitoring Team and SDG&E Compliance Personnel to resolve any compliance incidents
- Reviewing all CPUC and SDG&E daily and weekly monitoring reports
- Preparing MMCRP monthly compliance reports and submitting to the CPUC
- Preparing NTPs for Monitoring Manager's review and CPUC's review and sign-off
- Reviewing and processing MPRs and TEWS requests
- Reviewing SDG&E's compliance reports for consistency with field observations and identifying and reconciling any inconsistencies
- Coordinating all aspects of the project with the SDG&E Compliance Personnel

3.2.1.4 CPUC Environmental Monitors

CPUC Environmental Monitors (EMs) shall be identified for the project. CPUC EMs shall be the primary field personnel for CPUC and responsible for verifying compliance with project requirements at the project site as directed by the CPUC Monitoring Team. Additional monitors may be used as needed depending on concurrent construction activities and specific monitoring needs. The responsibilities of the CPUC EMs are:

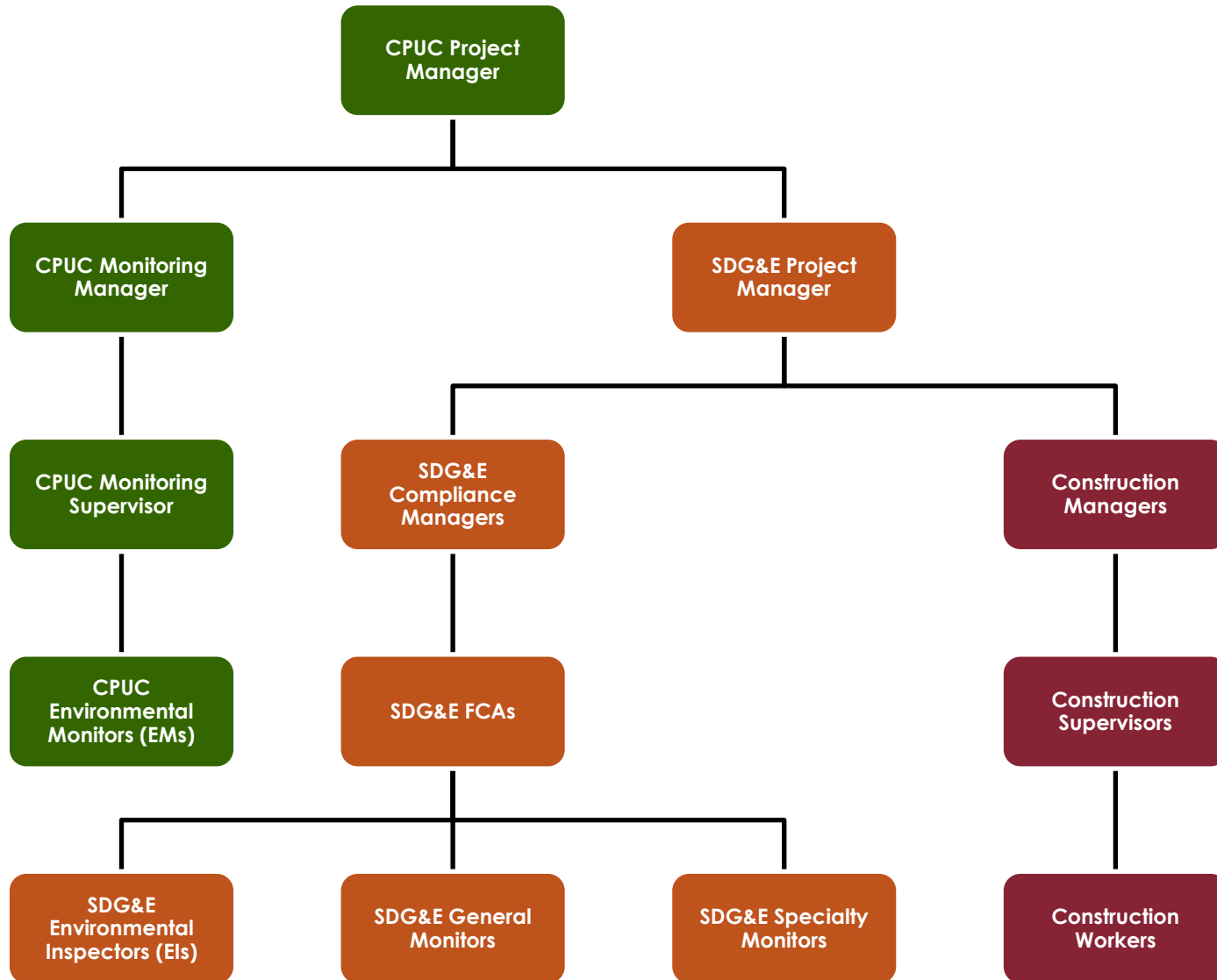
- Inspecting the project site, documenting construction and compliance activities, and reporting any potential issues and incidents
- Preparing and submitting daily monitoring reports to the CPUC Monitoring Managers, and relaying any important information about the project delivered in the field

3.3 PROJECT ORGANIZATION CHART

An organizational chart of CPUC and SDG&E project personnel is shown on Figure 3.3-1. The organization chart illustrates preliminary lines of communication between project team members. The names of individuals performing the roles and their contact information will be listed in Tables C-1 and C-2 located in Appendix C. Both CPUC and SDG&E are responsible for keeping one another informed of staffing changes and providing contact information.

3 ROLES AND RESPONSIBILITIES

Figure 3.3-1 Project Organization Chart



3 ROLES AND RESPONSIBILITIES

3.4 JURISDICTIONAL AGENCIES

Personnel from jurisdictional agencies may periodically visit the project site to verify compliance, or request information regarding compliance with various project requirements, or in response to a violation, should one occur. SDG&E is responsible for satisfying requests from jurisdictional agencies, submitting the permits and authorizations to CPUC, as required and notifying CPUC of any changes to agency requirements in a timely manner. SDG&E shall provide CPUC with copies of permits and authorizations according to project requirements, if CPUC is not directly involved with the coordination effort. The CPUC will typically coordinate with SDG&E of permitting concerns prior to contacting permitting agencies; however, the CPUC may contact jurisdictional agencies at any time regarding the project and to clarify agency requirements, permit conditions, or approvals relating to their jurisdiction, as needed.

4 PROCEDURES

This section addresses MMCRP procedures for personnel identified in Section 3 that shall be implemented prior to, during, and following construction, in order to facilitate successful implementation and documentation of project requirements. Procedures in this section include general communication guidelines, standard CPUC practices, and documentation tools developed from experience with past CPUC projects that involved mitigation monitoring oversight.

4.1 COMMUNICATION GUIDELINES

Clear communication will be critical for successful implementation of the MMCRP, and will reduce the likelihood of issues that may arise, such as project delays, compliance violations, and safety incidents. Environmental and construction personnel must regularly communicate and maintain professional and responsive communications at all times. The SDG&E Compliance Team and CPUC Monitoring Team must coordinate closely to clarify questions regarding implementation before issues occur, to develop expectations regarding compliance documentation, and to resolve any issues that may arise in a timely manner. This section addresses general communication procedures for the project.

4.1.1 Meetings

SDG&E or CPUC may request as-needed meetings on an occasional or regular basis to discuss construction and compliance activities, proposed project changes, reporting and documentation procedures, compliance procedures, and to resolve issues. Meetings may be held in the field at the project site or over the phone. Key decision makers from the SDG&E and CPUC teams shall be given an opportunity to participate in important meetings. The results of all meetings shall be documented in MMCRP reports prepared by both SDG&E and CPUC.

4.1.2 Site Visit Coordination

Field personnel from both SDG&E and CPUC shall coordinate site visits with a designated SDG&E EI who is familiar with authorized construction activities, project requirements, and any restricted areas (i.e., dangerous conditions, unauthorized work areas or work private properties, or the presence of sensitive resources). Conditions in the field may change rapidly and SDG&E field personnel must ensure that all field personnel are adequately informed of restricted areas, parking locations, and communication procedures on an ongoing basis.

A CPUC EM shall conduct routine site inspections. Site inspections would be generally conducted when project activities are occurring; however, site visits may be conducted during inactive periods if necessary. At a minimum, the CPUC EM will notify a designated SDG&E EI

4 PROCEDURES

prior to visiting the site. If contact cannot be made, the CPUC monitoring personnel will inspect open project areas on foot. The CPUC EM shall at no time enter the construction site unless authorized or escorted by a member of the SDG&E Compliance Team who is familiar with the property.

4.1.3 Questions and Clarifications

Questions and the need to clarify project requirements will periodically arise throughout the implementation process. Both SDG&E and CPUC shall submit important questions and clarifications in writing via email. Resolutions and any CPUC determinations shall be documented in compliance and monitoring reports, and/or in email correspondence. Questions and clarifications that take an extended period of time to resolve shall be tracked by the CPUC Monitoring Team until a resolution has been reached.

4.1.4 Requests for Documentation

The CPUC Monitoring Team may periodically request written documentation and confirmations from the SDG&E Compliance Team that will be entered into the project record. Requests for documentation and confirmations shall be submitted via email. If the information will take an extended period of time to gather, both SDG&E and CPUC shall agree upon a timeframe to respond, and the request shall be tracked by the CPUC Monitoring Team until a resolution has been reached.

4.1.5 Schedule Updates

SDG&E shall inform the CPUC Monitoring Team of any delays in the construction schedule that may affect the project and implementation of the MMCRP.

4.1.6 Dispute Resolution

Disputes or complaints may develop between SDG&E and CPUC (“Affected Participants”) if there are conflicting opinions regarding project requirements and procedures. It is expected that the MMCRP will reduce or eliminate the potential for disputes; however, disputes may occur even with the best preparation.

Any issues shall first be addressed informally at the field level between the CPUC EM and SDG&E EI, or during project progress meetings. Questions may be directed to other members of the SDG&E Compliance Team and the CPUC Monitoring Team as needed. If the issue cannot be resolved informally in the field, the following procedures shall be implemented:

- **Step 1.** Disputes and complaints should be directed first to the CPUC Project Manager, for resolution. The Project Manager would attempt to resolve the dispute.
- **Step 2.** Should this informal process fail, the CPUC Project Manager may initiate enforcement or compliance actions to address deviations from the approved project or adopted MMRP.

4 PROCEDURES

- **Step 3.** If a dispute or complaint regarding the implementation or evaluation of the MMRP cannot be resolved informally or through enforcement or compliance action by the CPUC, any Affected Participant in the dispute or complaint may file a written “notice of dispute” with the CPUC’s Executive Director or his/her designee. This notice should be filed in order to resolve the dispute in a timely manner, with copies concurrently served on the other Affected Participant. Within 10 days of receipt, the Executive Director or designee(s) shall meet or confer with the filer and other Affected Participant for purposes of resolving the dispute. The Executive Director shall issue an Executive Resolution describing his/her decision, and serve it on the filer and the other Affected Participant.
- **Step 4.** If one or more of the Affected Participants is not satisfied with the decision as described in the Executive Resolution, such party(ies) may appeal it to the CPUC via a procedure to be specified by the CPUC.

Affected Participants may also seek CPUC review through existing procedures specified CPUC’s Rules of Practice and Procedure for formal and expedited dispute resolution, although a good faith effort should first be made to use the foregoing procedure.

4.2 NOTICE TO PROCEED PROCESS

SDG&E is required to obtain CPUC authorization prior to initiating project activities through the Notice to Proceed (NTP) process. The NTP process involves the SDG&E Compliance Team submitting an NTP request package to the CPUC Monitoring Team, and the CPUC Project Manager issuing an NTP Authorization Letter. Project activities may be authorized through one or more NTPs for separate project phases as determined necessary by the SDG&E Compliance Team and the CPUC Monitoring Team. At a minimum, NTP request packages shall include the following information:

- NTP request number
- Date submitted to CPUC
- Requested approval date
- Anticipated start and end date for the proposed actions
- Description of the proposed actions requested in the NTP
- A summary list of any previously authorized actions (if applicable) as detailed in NTP Authorization Letters
- A summary list of any actions that have not been proposed or authorized that must be included with future NTP requests
- A summary list of any outstanding requirements and documentation not included with the NTP package, and the anticipated dates they will be provided
- If known at the time the NTP is prepared, any Minor Project Refinements or Temporary Extra Work Space related to the proposed actions (refer to Section 4.4)

The CPUC Monitoring Team shall review NTP requests to ensure the proposed actions are consistent with the IS/MND and final CPUC decision, and to verify compliance with all pre-

4 PROCEDURES

construction requirements. The CPUC Monitoring Team may request additional information during the NTP review process as needed. Once it has been determined that all pre-construction requirements have been completed and documented to the satisfaction of CPUC, the CPUC Project Manager will submit an NTP Authorization Letter to the SDG&E Compliance Team. The NTP Authorization Letter will address any conditions of approval, and include applicable documentation as necessary for the authorized actions.

Note: It is highly suggested that SDG&E consult the CPUC well in advance of submitting NTP requests to establish clear expectations. Incomplete NTP Requests may result in delays to the construction schedule.

4.3 INCIDENTS

The goal of this MMCRP is to plan for and avoid any issues that could occur during implementation; nonetheless, there is a potential for issues to arise due to a variety of factors. For the purposes of this MMCRP, any issues that are observed with compliance, issues related to health and safety, or public complaints shall be documented as incidents. This section addresses incidents that may occur and procedures that shall be followed to document them.

4.3.1 Incident Categories

Incident categories for the project include compliance level incidents, health and safety incidents, and public complaints.

4.3.1.1 Compliance Level Incidents

SDG&E and CPUC are responsible for evaluating compliance and addressing any issues throughout implementation of the MMCRP. Issues with compliance will be documented by assigning one of four severity levels and associated terms. If all project requirements are being followed and no issues are observed, then the project would be at an acceptable compliance level (Level 0: Acceptable) and no further actions are required. A description of compliance levels that will be used for the project and examples of compliance level incidents are listed in Table 4.3-1.

When documenting compliance level incidents, the reporting party shall assign an initial compliance level that appropriately represents the severity of the issue based on factors including, but not limited to the following:

- Scope of the deviation or violation
- Risk of impact to resources
- Actual impact to resources
- Number of repeated issues
- How the incident could have been prevented

The need to change initially reported compliance levels may arise if the incident level was over- or under-reported. The CPUC Project Manager shall make final determinations regarding the appropriate compliance level for each incident as needed, and the CPUC Monitoring Team shall

4 PROCEDURES

maintain a record of all incidents for the project that will be analyzed in the post-construction and final monitoring reports.

Table 4.3-1 Compliance Levels

Incident Level, Reporting Term, and Severity	Examples	Action	Follow-Up
Incident			
<p>Level 1: Minor Problem <i>Out of compliance (low to moderate severity)</i></p> <hr/> <p>Definition: An event or observation that slightly deviates from project requirements, but does not impact or have the potential to impact a resource.</p>	<p>Project personnel used an unauthorized turnaround area or access road, but the site was previously disturbed, and the action did not put a sensitive resource at risk.</p> <p>Soil or construction material was placed outside of an approved work area in a non-sensitive area, but the material was removed at the end of the day.</p>	<p>An oral warning shall be provided by the CPUC Monitoring Supervisor to SDG&E's EPM (or assigned designee). Corrective action shall begin by the next construction day. CPUC Monitoring Supervisor will also briefly document the incident in a follow-up email. A Minor Problem will be documented in the daily report and included in the Weekly Compliance Report.</p>	<p>If corrective action is not begun by the next construction day, the CPUC Monitoring Supervisor will elevate the incident to the CPUC Monitoring Manager who will review courses of action available and will notify the CPUC PM if necessary. If allowed to continue, this non-compliance could result in a significant impact over time.</p>
<p>Level 2: Compliance Deviation <i>Out of compliance (moderate to high severity)</i></p> <hr/> <p>Definition: An event or observation that deviates from project requirements and puts a resource at risk, but is corrected without impacting, or potentially impacting, the resource.</p>	<p>A fuel tank was stored overnight within specified limits of a water body without secondary containment, but did not result in the release of hazardous materials.</p> <p>Mobilization of equipment or materials to a previously disturbed work site prior to receiving NTP authorization from CPUC.</p> <p>Project personnel used an unauthorized overland travel route and previously undisturbed turnaround area or access road, but the action did not impact a sensitive resource.</p> <p>A diesel-powered vehicle not in use was observed idling for more than 5 minutes.</p>	<p>A verbal notice shall be given to the SDG&E LEI or EI, followed immediately by written documentation of the incident in a Project Memorandum sent by the CPUC Monitoring Supervisor to SDG&E's EM (or assigned designee). Corrective action shall begin immediately if feasible.</p>	<p>If corrective action is not taken immediately or the corrective action is insufficient, the CPUC EM shall notify the CPUC PM, Monitoring Manager, and Monitoring Supervisor, who will review courses of action available, potentially including issuance of an NCR, a Project stop work order and/or action under the CPUC's CEQA Citation Program.</p>
<p>Level 3: Non-Compliance</p>	<p>Vegetation clearing and grading of a work site prior</p>	<p>A verbal notice shall be given to the SDG&E LEI</p>	<p>If a shutdown of construction or an activity</p>

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Incident Level, Reporting Term, and Severity	Examples	Action	Follow-Up
<p><i>Out of compliance (high severity)</i></p> <hr/> <p>Definition: An event or observation that violates project requirements and impacts a resource. Repeated Compliance Deviations left unaddressed may also rise to a Level 3 Incident.</p>	<p>to receiving NTP authorization from CPUC. Soil or construction material was placed outside of an approved work area in an environmentally sensitive area.</p> <p>Erosion control Best Management Practices (BMPs) failed during a storm and sediment was discharged into a sensitive area.</p> <p>Project vehicles entered a sensitive resource exclusion area and damaged a resource.</p>	<p>or EI, followed immediately by a written NCR from the CPUC Monitoring Manager to SDG&E's EPM (or assigned designee). Corrective action shall begin immediately. Based on the severity of a given infraction or pattern of non-compliant activity, the CPUC may direct that all or some portion of the work be stopped. The CPUC may also exercise the CEQA Citation Program.</p>	<p>is ordered, the construction or activity shall not resume until authorized by the CPUC PM in writing. If corrective action is not taken immediately or the corrective action is insufficient, the CPUC EM shall notify the CPUC PM, Monitoring Manager, and Monitoring Supervisor, who will review courses of action available, potentially including a Project stop work order and/or action under the CPUC's CEQA Citation Program.</p>

4.3.1.2 Health and Safety Incidents

SDG&E and CPUC's most important responsibility is maintaining safe working conditions and protecting the public including workers from exposure to hazards related to the project. SDG&E will report health and safety incidents to the CPUC consistent with the "self-identified potential violation" requirements of the CPUC's Safety Citation Program and the Accident Reporting Requirements. SDG&E and CPUC shall provide notification and prepare Incident Reports for health and safety incidents; however, health and safety incidents will not necessarily reflect negatively on SDG&E's environmental compliance record unless a specific project requirement, permit, or plan requirement was violated.

4.3.1.3 Public Complaints

The public may take issue with one or more aspects of the project. MM Noise-1 includes specific requirements for processing noise complaints from the public. All other public complaints that do not relate to noise shall be documented as an incident. Public complaints may be submitted formally to SDG&E or CPUC, or informally to field personnel at the project site.

SDG&E may elect to work with members of the public to resolve any complaints. The CPUC Monitoring Team shall not intervene with SDG&E's resolution process unless the complaint is related to specific compliance requirements or a previously unidentified impact related to CEQA review. The CPUC Project Manager shall make any final determinations regarding the necessity of corrective actions following public complaints.

Public complaints will not reflect negatively on SDG&E's environmental compliance record unless a specific project requirement was violated.

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4.3.2 Notification

SDG&E and CPUC shall notify one another of incidents per the requirements of Table 4.3-1 so the issues can be adequately addressed. Response procedures do not need to be finalized when initial notification is provided. Over time the SDG&E Compliance Team and CPUC Monitoring Team may collectively agree to reduce the notification requirement for Level 1 Occurrences because, if documented correctly, these issues would be minor and inconsequential. Changes in the notification procedures for incidents must be authorized by the CPUC Project Manager.

Jurisdictional agencies may also require notification if incidents are documented that relate to their jurisdiction over the project. CPUC will determine if other agencies should be notified when incidents are documented and either contact agency representatives directly, or direct SDG&E to do so and to provide documentation.

4.3.3 Incident Reports

Incident Reports shall be prepared by the observing party (either SDG&E or CPUC) and submitted to the alternate party within one business day of the observation if a Minor Problem, Compliance Issue, or Noncompliance is documented (Levels 2-3). Incident Reports are not required if an Occurrence (Level 1) is documented. At a minimum, Incident Reports must include the following information:

- Incident Category
- Compliance Level (if applicable)
- Incident Start Date (i.e., date event began if known or initial observation date)
- Summary of Incident (i.e., description of the event or observation, personnel present, and actions taken to resolve the issue)
- Resolution Date (if known)

Incidents shall be addressed in MMCRP reports prepared by both SDG&E and CPUC as described in Section 2.2.8 (e.g., daily, weekly, monthly, and post-construction reports, as applicable), and Incident Reports shall be attached to the MMCRP reports for the applicable period.

In addition to Incident Reports, events rising to the level of Noncompliance may require preparation of memoranda in order to describe the event in greater detail and the corrective actions necessary to bring the project back into compliance.

4.3.4 Stop Work Orders

When it is safe to do so, any member of the SDG&E Compliance Team or CPUC Monitoring Team has the authority to issue Stop Work Orders to temporarily halt or redirect project activities if a sensitive resource is put in undue risk beyond previously authorized or permitted levels. In addition, the CPUC Monitoring Team may also stop or redirect work if unauthorized project activities are observed, such as use of a work area that has not been approved or if substantial issues remain unresolved. The CPUC Project Manager will make any final determinations regarding Stop Work Orders for the project.

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4.3.5 CEQA Citation Program

The CPUC may exercise the CEQA Citation Program adopted by the Commission in Resolution E-4550. The program delegates authority to Commission staff to draft and issue citations and levy fines for non-compliance with CEQA requirements. The Resolution allows Commission staff to efficiently issue fines when needed to quickly address non-compliance incidents that are occurring in the field.

4.4 PROJECT CHANGES

4.4.1 Minor Project Refinements

SDG&E may identify a need to refine one or more aspects of the project following CPUC's final decision. In such cases, SDG&E is required to submit Minor Project Refinement (MPR) requests to the CPUC Monitoring Team and obtain authorization from the CPUC Project Manager through the process described in this section.

Approval for MPR requests will only be granted if the proposed refinements achieve or exceed the level of environmental protection approved in the IS/MND, are consistent with CEQA requirements, and comply with the APMs and MMs identified in the IS/MND. Requests for project refinements that do not fall within the authority delegated to the CPUC Project Manager as defined in the CPUC's final decision must be sought through a Petition for Modification pursuant to Rule 16.4 of CPUC's Rules of Practice and Procedure. Proposed project refinements will not be authorized by the CPUC Project Manager through the MPR process if they would meet one or more of the following criteria:

- Are located outside the geographic boundary of the study area of the Final MND
- Result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the Final MND
- Conflict with any mitigation measure or applicable law or policy
- Trigger an additional permit requirement

At a minimum, MPR requests must include the following information:

- MPR request number
- Date submitted to CPUC
- Requested approval date
- Anticipated start and end date for the proposed actions associated with the refinements
- Description of the proposed refinements, including an explanation of why the refinements are necessary
- A summary list of applicable project requirements (e.g., APMs, MMs, project parameters, or other project stipulations) for which the refinements are being requested

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- Supporting photos, maps, and other documentation illustrating the difference between the existing conditions in the area, the approved project, and the proposed refinements
- The dimensions and area of any additional work areas and land disturbance associated with the proposed refinements
- A detailed description of potential impacts of the proposed refinements, including a discussion of each environmental issue area that could be affected by the refinements, with accompanying verification that there will be no increase in significant impacts to resources affected by the project and no new significant impacts, after application of previously adopted mitigation
- A summary of water features and stormwater considerations including any changes to jurisdictional features and the use of erosion and sediment control BMPs
- A statement describing if the proposed refinements would conflict with any APM, MM, or applicable law or policy or if they would trigger an additional permit requirement
- Evidence of SDG&E's consultation with applicable agencies and any Native American tribes, to the extent applicable

The CPUC Monitoring Team shall review MPR requests to ensure the proposed refinements are consistent with the IS/MND and final CPUC decision. The CPUC Monitoring Team may request additional information during the MPR review process as needed. If it is determined that the MPR request includes sufficient evidence that the proposed refinements are necessary, there are no environmentally preferable alternatives to the refinements, and the refinements would not meet one or more of the exclusionary triggers, then the CPUC Project Manager would authorize the refinements by issuing a MPR Authorization Letter at their discretion. MPR Authorization Letters will address any conditions of approval, and include applicable documentation as necessary.

Examples of potential MPRs, depending on their location, may include the following:

- Adding a temporary extra work area for no more than 60 days of use if the proposed location is in a previously disturbed area with no adjacent sensitive resources or land uses
- Substituting or replacing a previously authorized work area with an alternate work area that is in a previously disturbed area with no adjacent sensitive resources or land uses
- Adjusting the alignment of a project to avoid unanticipated impacts related to cultural artifacts, buried utility infrastructure, hazardous and toxic substances, and other land use impacts including effects on homeowners, so long as the adjustment does not create a new significant impact or a substantial increase in the severity of a previously identified significant impact
- Adjusting the alignment of a project to avoid or adapt to conditions on the ground that vary from the conditions that existed at the time of the original environmental

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analysis, so long as the adjustment does not create a new significant impact or a substantial increase in the severity of a previously identified significant impact

4.4.2 Temporary Extra Work Space

For the purposes of this MMCRP, TEWS is defined as a preexisting developed space (i.e., no site preparation is required) that would be used by SDG&E during construction for a period of up to 60 days, and that was not specifically identified and evaluated during the CEQA process. Additional work space requests that would be used for more than 60 days must be processed as a MPR (refer to Section 4.4.1). If SDG&E determines a need for a construction TEWS, it must submit such a request to the CPUC, consistent with the communication protocol. SDG&E will not be permitted to use a TEWS prior to receiving written authorization from the CPUC.

SDG&E must demonstrate that:

- The TEWS is located in a disturbed area with no sensitive resources or land uses onsite or within proximity to the proposed work space such that they would be significantly impacted by the work,
- SDG&E has the permission of the applicable landowner (e.g., municipality or private) to use the work space, and
- Use of the TEWS will not result in any new significant environmental impacts.

Following is a list of the specific information that SDG&E will be required to submit with its TEWS request (see Appendix D for form):

- Date of request
- Location of the TEWS (detailed description, including maps if required)
- Property owner of TEWS
- An explanation of the need for the TEWS
- An analysis that demonstrates no new significant impacts will result from use of the TEWS, such as: compaction contributing to runoff rates or other stormwater/watershed effects; observed existing impacts to the site, such as the presence of potentially hazardous or polluting substances that could pose a risk to Project personnel or the public; abandoned vehicles, equipment, or other materials; or other sensitive resources
- Biological and botanical surveys if appropriate
- Cultural resource survey if appropriate
- Duration and dates of expected use of the TEWS
- Details of the expected condition of the site after use

5 RECORDS MANAGEMENT

5.1.1 Tracking Systems

5.1.1.1 Requirements

The CPUC Monitoring Team will track the status and completion of key project requirements using the following matrix tracking tables located in Appendix B:

- Table B-1: Permits and Authorizations Tracking
- Table B-2: Plans Tracking
- Table B-3: Notifications Tracking

The CPUC Monitoring Team and SDG&E Compliance Team shall use these tables to communicate status updates and the completion of the listed requirements during the NTP process. The dates and descriptions added to the matrix tracking tables shall be supported by referenced documentation, as specified in the requirement sources (e.g., APMs, MMs, permits, plans, etc.).

Compliance with repetitious requirements that would be implemented throughout construction (e.g., wildlife clearances, field monitoring, avoidance and minimization activities) shall be documented in the daily (if required) and weekly reports prepared by SDG&E and the CPUC (refer to Section 2.2.9).

5.1.1.2 Requests and Authorizations

CPUC will track the dates and criteria of important requests and authorizations for the project (e.g., NTPs, MPRs, and TEWS) as part of the Monthly Monitoring Summary Report.

5.1.1.3 Incidents

A summary of any incidents will also be tracked as part of the Monthly Monitoring Summary Report, and the CPUC Monitoring Team will maintain a master table of incidents that will be evaluated in the Final Monitoring Report (refer to Section 2.2.9).

5.1.1.4 Supporting Documentation

The CPUC Monitoring Team shall maintain records of all reports, memoranda, and other supporting documentation that are used to verify compliance. These records will be attached to the Monthly Mitigation Monitoring Reports or the Final Mitigation Monitoring Report, unless otherwise determined confidential by the CPUC Project Manager.

5 RECORDS TRACKING AND MANAGEMENT

5.1.2 Public Access to Records

The public is allowed access to records used to monitor and track compliance with project requirements. Such records will be made available to the public upon request unless the records are confidential. In order to facilitate public awareness, the MMCRP will be posted on the project website:

http://www.cpuc.ca.gov/environment/info/panoramaenv/TL695_TL6971/Pendleton.html

If determined necessary by the CPUC Project Manager, Monthly Monitoring Summary Reports will also be posted on the project website during construction.

6 APPLICANT PROPOSED MEASURES AND MITIGATION MEASURES

Table 6-1 lists the APMs and MMs from the IS/MND that apply to the project and the phase of implementation for each measure. The APM and MM Implementation Table in Appendix A includes the full text of each measure, the performance criteria, when the measure will be implemented, and where the measure applies. Table 6-1 also notes where MMs and APMs have been superseded by other MMs. In such cases, the superseded MM or APM is not carried forward in Appendix A or Appendix B.

Table 6-1 Implementation Phases Applicable to Each APM and MM

Measure Title	Pre-Construction	Construction	Post-Construction	O&M ^a
Aesthetics				
MM Aesthetics-1: Nighttime Lighting		✓		
Biological Resources				
APM BIO-01: Migratory Birds	Superseded by MM Biology-6: Mitigation for Bird Species			
APM BIO-02: Coastal California Gnatcatcher	Superseded by MM Biology-7: Coastal California Gnatcatcher Avoidance and Minimization			
APM BIO-03: Pacific Pocket Mouse	Superseded by MM Biology-11: Mitigation for Pacific Pocket Mouse			
APM BIO-04: Arroyo Toad	Superseded by MM Biology-5: Arroyo Toad Avoidance and Minimization			
APM BIO-05: Impacts to Federally and State Listed Species.	✓	✓		
MM Biology-1: Avoidance and Minimization of Impacts on Special-Status Plants	✓	✓	✓	
MM Biology-2: Worker Behavior Protocols		✓		✓
MM Biology-3: Worker Training	✓	✓		
MM Biology-4: Pre-Construction Surveys and Biological Monitoring	✓	✓	✓	

5 RECORDS TRACKING AND MANAGEMENT

Measure Title	Pre-Construction	Construction	Post-Construction	O&M ^a
MM Biology-5: Arroyo Toad Avoidance and Minimization	✓	✓	✓	
MM Biology-6: Mitigation for Bird Species	✓	✓		
MM Biology-7: Coastal California Gnatcatcher Avoidance and Minimization	✓	✓	✓	
MM Biology-8: Restoration for Temporarily Impacted Habitat	✓	✓	✓	
MM Biology-9: Compensation for Permanently Impacted Habitat	✓			
MM Biology-10: Burrowing Owl Mitigation and Monitoring	✓	✓		
MM Biology-11: Mitigation for Pacific Pocket Mouse	✓	✓		
MM Biology-12: Invasive Weed Control	✓		✓	✓
MM Biology-13: Vernal Pool Avoidance and Minimization		✓	✓	✓
MM Biology-14: Access Road Grading Measures		✓		✓
Cultural Resources				
APM CUL-01: Stub Pole Structure in San Mateo Archaeological District (SMAD)	Superseded by MM Cultural-1: Cultural Resource Monitoring, MM Cultural-2: Cultural Resource Avoidance Procedures, and MM Cultural-3: Discoveries of Cultural Resources			
APM CUL-02: Additional Avoidance and Minimization		✓	✓	
APM CUL-03: Cultural Resources Sensitivity Training	Superseded by MM Cultural-4: Worker Training			
APM CUL-04: Archaeological Monitoring	Superseded by MM Cultural-1: Cultural Resource Monitoring, MM Cultural-2: Cultural Resource Avoidance Procedures, and MM Cultural-3: Discoveries of Cultural Resources			
APM CUL-05: Unanticipated Discovery of Human Remains	Superseded by MM Cultural-5: Procedure for Discovery of Human Remains			
APM CUL-06: Paleontological Monitoring	Superseded by MM Paleo-1: Paleontological Monitoring			
APM CUL-07: Unanticipated Discovery of Fossils	Superseded by MM Paleo-2: Evaluation and Treatment of Previously Undiscovered Paleontological Resources			
MM Cultural-1: Cultural Resource Monitoring	✓	✓		

5 RECORDS TRACKING AND MANAGEMENT

Measure Title	Pre-Construction	Construction	Post-Construction	O&M ^a
MM Cultural-2: Cultural Resource Avoidance Procedures	✓	✓		
MM Cultural-3: Discoveries of Cultural Resources		✓		
MM Cultural-4: Worker Training	✓			
MM Cultural-5: Procedure for Discovery of Human Remains		✓		
MM Cultural-6: Access Road Grading Measures		✓		✓
MM Paleo-1: Paleontological Monitoring	✓	✓		
MM Paleo-2: Evaluation and Treatment of Previously Undiscovered Paleontological Resources		✓		
Geology, Soils, and Mineral Resources				
MM Geology-1: Geotechnical Investigation	✓	✓		
Hazards and Hazardous Materials				
MM Hazards-1: Hazardous Substance Management and Emergency Response Plan (HSMERP)	✓	✓	✓	
MM Hazards-2: Site-Specific Blasting Plan	✓	✓	✓	
MM Hazards-3: Unexploded Ordnance and Worker Safety Training	✓	✓		
MM Hazards-4: Hazardous Materials Measures for Access Road Grading.		✓		✓
Hydrology and Water Resources				
APM HYD-01: Work within and near Jurisdictional Wetlands		✓		
MM Hydrology-1: Groundwater Extraction		✓		
MM Hydrology-2: Best Management Practices Inspection and Maintenance		✓	✓	

5 RECORDS TRACKING AND MANAGEMENT

Measure Title	Pre-Construction	Construction	Post-Construction	O&M ^a
MM Hydrology-3: Stormwater Controls for Access Road Grading		✓		✓
Noise				
APM NOI-01: Construction Notification	Superseded by MM Noise-2: Notification and Complaints			
APM NOI-02: Meet and Confer with City of San Clemente	Superseded by MM Noise-1: Adherence to City of San Clemente Noise Ordinance			
APM NOI-03: Helicopter Use	Superseded by MM Noise-3: Helicopter Use			
MM Noise-1: Adherence to City of San Clemente Noise Ordinance		✓		
MM Noise-2: Notification and Complaints	✓	✓		
MM Noise-3: Helicopter Use		✓		
Recreation				
APM REC-01: Construction Notification	✓		✓	
MM Recreation-1: Trail Detours and Notifications	✓	✓		
MM Recreation-2: Pre- and Post-Project Trail Condition Report	✓	✓	✓	
Traffic and Transportation				
MM Traffic-1: Pre-Construction Road Condition Assessment and Repair	✓		✓	
MM Traffic-2: Traffic Plan	✓	✓		
MM Traffic-3: Consult with Bus and Transit Services	✓	✓		
MM Traffic-4: Traffic Controls for Access Road Grading		✓		✓
Utilities and Public Services				
MM-Utilities-1: Utility Measures for Access Road Grading		✓		✓

^a O & M measures are conditions of authorization enforced by MCB CPEN, in compliance with SDG&E's Subregional NCCP Standard Operational Protocols